bp

IHW-[illegible]9164-CO
HZ/RC/TE

TXR9
TXD000751172

fin 3/12/01

BP Chemicals, Inc.
13050 State Highway 185
P.O. Box 659
Port Lavaca, TX 77979
USA

Switchboard 361 552 7543
Central Fax 361 552 8647

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
(MC-129)
Registration and Reporting Division
Attn: Ellette Vinyard
P. O. Box 13087
Austin, TX 78711-3087

February 15, 2001

Direct 361 552 7543

Re: Notice of Registration Amendment for Aceto Stripper : 32164

Dear Ms. Vinyard:

Please place NOR management waste unit 010 (Aceto stripper – distillation unit separates water and aceto) to the inactive list. Since this constitutes a removal we are unable to transmit this change electronically. Thank you in advance for your help!

Please contact Wayne LaCroix 361/552-8660 if there are questions concerning this matter.

Sincerely,

Wayne E. LaCroix
Environ. Coordinator

H:\LACROIX\DATA\WP\ Enviro| WATER Report TPDES amended

Enclosure

Calhoun
HH 2/16
3115 EG

From: Richard Carmichael
To: Granja, Elizabeth
Date: Wed, Feb 28, 2001 11:54 AM
Subject: BP Chemicals - IHW Doc# 4367-2

Elizabeth

I was asked to respond to your request regarding BP Chemical's request to move an Aceto Stripper: 32164, NOR management waste unit 010 to the inactive list. The above referenced unit is not a listed unit in BP's HW permit #50121-000.
So as far as IHW is concerned BP may inactivate the Aceto Stripper.

Thank you for coordinating. Richard

CC: Martins, Judy; Prater, Faye

Waiting on Permits
2-26-01

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 31, 2002

Mr. Jerome P. Houren
Manager, HSE - Financial & Performance Improvement
BP Amoco Corporation
Mail Code 7081A
801 Warrenville Road
Lisle, IL 60532-3819

Re: Notice of Deficiency for:
BP Products North America Inc
(SWR No. 30139, SWR No. 34507 and WDW No.s 80, 127, 128, 214 and 215)
BP Amoco Chemical Company
(SWR No. 30042)
BP Chemicals, Inc.
(SWR No. 32164 and WDW No.s 163, 164 and 165)

Dear Mr. Houren:

Although the Texas Natural Resource Conservation Commission (TNRCC) has received the financial assurance mechanisms used to demonstrate your company's 2002 RCRA waste responsibilities, a formal acceptance cannot be made at this time due to one or more of the following:

☑ The financial assurance mechanism used for closure, post closure or corrective action does not contain the exact language as set out in Title 30, Texas Administrative Code, Chapter 37.

☑ Other Matters - As was discussed by phone with Michelle Bien pertaining to closure cost estimates.

Please arrange to have the corrections referenced above and as discussed by phone to our office no later than **June 30, 2002.** Failure to provide corrections to these documents or submit another acceptable financial assurance mechanism by the prescribed date will result in a Notice of Violation and may become part or your compliance history.

Should you have any questions or need additional assistance, I can be reached at 512/239-6150.

Sincerely,

Mark Stoebner
Program Specialist
Financial Assurance Section, MC-184

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 7, 2001

Mr. Jerome P. Houren
Manager, HSE - Financial & Performance Improvement
BP Amoco Corporation
Mail Code 7081A
801 Warrenville Road
Lisle, IL 60532-3819

Re: Amoco Oil Company SWR No. 30139, SWR No. 34507 and WDW No.s 80, 127, 128, 214 and 215
BP Amoco Chemical Company SWR No. 30042
BP Chemicals, Inc. SWR No. 32164 and WDW No.s 163, 164 and 165
Financial Assurance Acceptance

Dear Mr. Houren:

The Commission has reviewed and accepts the financial assurance documents submitted that demonstrate your company's RCRA hazardous waste responsibilities for calendar year 2001. **This letter of acceptance is contingent upon the modification of Permit No. HW-50183 (SWR No. 34507 / EPA ID No. TXD072181381-01) by the next anniversary review date to reflect Amoco Oil Company and not the assumed name of Amoco Petroleum Products.**

We conduct ongoing monitoring of the financial status of facilities and may request additional information periodically. Discrepancies or status changes in financial assurance discovered during routine record review, permit processing or facility inspections may necessitate further action on your part to maintain compliance. Additionally, please submit in writing any future revisions or adjustments to financial assurance made by the company to this section.

Should you have any questions or need additional assistance I can be reached at 512/239-6150.

Sincerely,

Mark Stoebner
Program Specialist
Financial Assurance Section, MC-184

cc: Central Records

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 29, 2002

Mr. Jerome P. Houren
Manager, HSE - Financial & Performance Improvement
BP Amoco Corporation
Mail Code 7081A
801 Warrenville Road
Lisle, IL 60532-3819

Re: Financial Assurance Acceptance for:
BP Products North America, Inc.
(SWR No. 30139, SWR No. 34507 and WDW No.s 80, 127, 128, 214 and 215)
BP Amoco Chemical Company
(SWR No. 30042)
BP Chemicals, Inc.
(SWR No. 32164 and WDW No.s 163, 164 and 165)

Dear Mr. Houren:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed and accepts the financial assurance documents submitted that demonstrate your company's RCRA and UIC waste responsibilities for calendar year 2002 with respect to closure, post-closure and third party liability coverage. **Please be advised that this acceptance letter is contingent upon UIC permit Nos. WDW 80, 127, 128, 214 and 215 being modified to reflect the correct permittee name of "BP Products North America, Inc." by the next anniversary review date of March 30, 2003.**

As a reminder, your next inflation adjustment to your closure cost estimate as well as the third party liability coverage demonstration is due by **March 30, 2003.** Please arrange to have acceptable financial assurance mechanisms demonstrating these coverages to our office no later than the respective date noted above.

We conduct ongoing monitoring of the financial status of facilities and may request additional information periodically. Discrepancies or status changes in financial assurance discovered during routine record review, permit processing or facility inspections may necessitate further action on your part to maintain compliance. Additionally, please submit in writing any future revisions or adjustments to financial assurance made by the company to this section.

Should you have any questions or need additional assistance, I can be reached at 512/239-6150.

Sincerely,

Mark Stoebner
Program Specialist
Financial Assurance Section, MC-184

cc: Central Records

bp

IHW 32164

BP Chemicals Inc.
13050 State Highway 185
PO Box 659
Port Lavaca, TX 77979
USA

Texas Commission on Environmental Quality
Registration and Reporting Division (MC-129)
P.O. Box 13087
Austin, TX 78711-3087

November 25, 2002

RE: BP Chemicals
Green Lake NOR Update
NOR 32164

Dear Sir or Madam:

Please modify our Notice of Registration to reflect the following changes:

Unit Number 042 Container Store Area – change the unit status from active to inactive
Unit Number 054 Container Store Area - change the unit status from active to inactive
Unit Number 055 Container Store Area - change the unit status from active to inactive
Unit Number 057 Container Store Area - change the unit status from active to inactive
Unit Number 058 Container Store Area - change the unit status from active to inactive
Unit Number 059 Container Store Area - change the unit status from active to inactive
Unit Number 060 Container Store Area - change the unit status from active to inactive
Unit Number 009 Boiler – change the unit status from active to closed.

If you should have any questions regarding this request, please feel free to contact me at (361) 552-8642.

Sincerely,

Van A. Boone

Van A. Boone
HSSEQ Manager

7253

Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: The File
BP Chemicals/Green Lake
Permit No. HW-50143
SWR No. 32164
Doc. #4113-3

Date: May 24, 2001

Thru: per 5/24/01 Richard Carmichael, PhD.,P.E., CIH, Supervisor, Facility Team 3
I&HW Permits Section, Waste Permits Division

From: 5/24/01 Alan Parolini
I&HW Permits Section, Waste Permits Division

Subject: Annual 2000 Site Activity Report

The above referenced annual report, dated January 25, 2001, was submitted by BP Chemicals Inc. in accordance with Provision III. B. of the permit.

The staff has completed a review of this report and concludes that BP Chemicals, Inc. has fulfilled the requirements of Provision III. B. of their permit regarding annual site activity reporting.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 30, 2001

Mr. Patrick E. Gower
Plant Manager
BP Chemicals, Inc.
P. O. Box 659
Port Lavaca, Texas 77979

7000 0520 0023 2380 7432
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: BP Chemicals, Inc. - Green Lake (BP)
Industrial Solid Waste Registration No. 32164
Hazardous Waste Permit No. HW-50143
Closure Certification Report for AOG Boiler Nos. 1 and 2
Document No. 4218

Dear Mr. Gower:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed your Closure Certification Report dated February 1, 2001 addressing the closure of AOG Boilers Nos. 1 and 2 (NOR Unit No. 009).

Based on the information provided the TNRCC accepts that the closure of AOG Boiler Nos. 1 and 2 was completed in accordance with 40 CFR §265.110 through §265.115 and the risk reduction standards under 30 TAC §335 Subchapter S.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the closure fails to comply with these requirements, the burden remains upon BP to take any necessary and authorized action to correct such conditions.

Should you have any questions, please contact Mr. Steve Akers of the I&HW Permits Section at 512/239-1141. If responding by mail please use mail code (MC-130) after the recipient's name.

Sincerely,

William J Shafford, P.E.

Mr. William J. Shafford, P.E.
Combustion Team 1
Industrial and Hazardous Waste Permits Section
Waste Permits Division

WJS/SKA/fp

cc: Mr. Bill Gallagher, U.S. EPA Region VI (6PD-O)
Mr. Steve Akers, P.E., TNRCC Waste Permits Division, I&HW Permits Section

bp

HZ/RC/TE
TXD000751172

BP Chemicals Inc.
13050 State Highway 185
PO Box 659
Port Lavaca, TX 77979
USA

BP CHEMICALS GREEN LAKE

66103695

IHW 32164- Vol: 052

REPORT 2003 2002 ANNUAL SITE ACTIVITY

Industrial & Hazardous Waste Permits Section (MC-130)
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

January 22, 2003

BP Chemicals Inc.
HW-50143/SWR 32164
2002 Annual Site Activity Report

Dear Sir or Madame:

The 2002 Annual Site Activity Report for BP Chemicals Green Lake is enclosed. This report includes a Waste Minimization Summary and Certification along with a copy of the 2002 Annual Waste Summary. Please note that the original Annual Waste Summary has been submitted electronically to the TCEQ on January 16, 2003.

Please contact me at 361/552-8642 if you have any questions concerning this submittal.

Sincerely,

Van A. Boone
HSSEQ Manager

H:\data\wp\ANRPT2002

cc: TCEQ Region 14

WWC# 10220000 DOC# 2920-3
DUE DATE 5-27-03
PM ~~Y. Jones~~ JACKSON
TEAM □1 ☑2 □3 □UIC □TAT

SUMMARY

This summary includes leachate volumes collected from the four landfill cells at TCEQ NOR unit 027 ("New Landfill") and the two leachate collections systems from unit 004 ("Old Landfill") where Cells 1-4 share one leachate collection sump and Cell 5 has an upper and a lower sump.

Cells 6, 7, 8, and 9 are the BP Chemicals numbers for Cells 01, 02, 03, and 04 of permitted Unit 027.

Cell 9 of Unit 027 was placed into service on September 1, 1993 and was the active cell in 2002.

Landfill # 1-4

	Upper Gallons Removed
December 10, 2002	603.41
Total	**603.41**

Landfill #5

	Upper Gallons Removed	Lower Gallons Removed
October 25, 2002	109.70	
October 29, 2002	187.81	31.57
Total	**297.51**	**31.57**

Landfill #6

	Upper Gallons Removed	Lower Gallons Removed
January 7, 2002	53	
January 21, 2002	71	
February 18, 2002	81	29
March 20, 2002	35	22
April 11, 2002	36	
October 29, 2002	178	55
October 31, 2002	71	55
November 4, 2002	91	64
November 5, 2002	220	64
November 6, 2002	62	45
November 18, 2002	71	
November 19, 2002	81	
November 20, 2002	132	
November 21, 2002	81	
November 27, 2002	28	45
December 10, 2002	62	45
December 11, 2002	71	55
December 12, 2002	44	36
December 16, 2002	91	64
December 23, 2002	62	102
Total Gallons	**1621**	**681**

Landfill #7

	Upper Gallons Removed	Lower Gallons Removed
March 20, 2002	7	14
November 27, 2002	21	36
Total	**28**	**50**

Landfill #8

	Upper Gallons Removed	Lower Gallons Removed
March 20, 2002	28	45
November 27, 2002	28	55
December 10, 2002		36
December 16, 2002	7	
Total Gallons	**63**	**136**

Landfill #9

	Upper Gallons Removed	Lower Gallons Removed
January 16, 2002	91	179
January 21, 2002		92
January 28, 2002	35	73
February 21, 2002	28	121
February 25, 2002		55
February 28, 2002	14	36
March 18, 2002	44	45
March 20, 2002		14
April 4, 2002	14	64
May 2, 2002		45
May 3, 2002		45
July 1, 2002	91	73
July 21, 2002	102	92
July 25, 2002	62	73
July 29, 2002	44	64
July 30, 2002	7	0
July 31, 2002	35	14
August 1, 2002	28	36
August 14, 2002	91	92
August 19, 2002	102	55
August 29, 2002	44	29
August 30, 2002	44	29
September 11, 2002	71	55
September 12, 2002	28	22
September 16, 2002	276	73
October 23, 2002	276	83
October 24, 2002	276	64
October 25, 2002	276	174
October 27, 2002	276	179
October 29, 2002	276	29
October 30, 2002	71	
October 31, 2002	240	14
November 1, 2002	276	179
November 3, 2002	276	179
November 4, 2002	276	179
November 5, 2002	276	179
November 6, 2002	276	179
November 7, 2002	276	121
November 8, 2002	276	92
November 11, 2002	276	121
November 13, 2002	102	73
November 14, 2002	71	45
November 18, 2002	276	179
November 19, 2002		83
November 20, 2002	276	179
November 21, 2002	91	83
November 24, 2002	259	179
November 26, 2002	44	64
November 27, 2002	35	45
November 29, 2002	112	83
December 5, 2002	91	102
December 9, 2002	71	121
December 10, 2002	276	179
December 11, 2002	276	179
December 12, 2002	122	92
December 13, 2002	276	179
December 14, 2002	276	111
December 15, 2002	276	83
December 19, 2002	28	29
December 23, 2002	276	179
Total Gallons	**8384**	**5515**

Provisions VI.G (1-6)

Ground Water Report

TABLE OF CONTENTS

ATTACHMENT I

2002 Ground Water Sampling Data

The following abbreviations have been used in this report:

msl - mean sea level
ACN - acetonitrile
AN - acrylonitrile
CN - total cyanide
TOC - total organic carbon
As - arsenic
Ba - barium
Cd - cadmium
Cl - chlorides
Fe - iron
Pb - lead
Mn - manganese
Hg - mercury
Se - selenium
Ag - silver
Na - sodium
SO4 - sulfates
Cr - chromium
UG - upgradient
POC - point of compliance
SU - supplemental
BDL - below detection limit

TCEQ Unit 027

New Landfill

New Landfill

Well No.	Parameter	15th Year 3rd Qtr May 8, 2002	16th Year 1st Qtr. December 2, 2002
U-1 (Upgradient)	Ground Water Elev. (ft, msl)	6.72	7.2
	Temperature (celcius)	25.8,25.9,25.9,25.9	25.0,24.8,24.8,24.9
	Specific Cond.(uS/cm)	1607, 1605, 1612, 1610	1637, 1639, 1637, 1637
	Turbidity (NTU)	26.4,24.0,29.3,32.4	29.2,23.2,27.7,29.3
	TOC (ppm)	1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.95,6.99,7.01,7.04	6.86,6.88,6.89,6.91
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02,<0.02	<0.02,<0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)		<0.002
	Ba (ppm)		0.12
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.003
	Hg (ppm)		<0.0002
	Se (ppm)		<0.003
	Ag (ppm)		<0.01
	Cl (ppm)		390
	Mn (ppm)		<0.01
	Na (ppm)		270
	SO4 (ppm)		35
	Fe (ppm)		0.01
	Phenolics (ppm)		<0.005

New Landfill

Well No.	Parameter	15th Year 3rd Qtr May 8, 2002	16th Year 1st Qtr. December 2, 2002
U-2 (Upgradient)	Ground Water Elev. (ft, msl)	10.02	10.62
	Temperature (celcius)	26.4,26.0,26.1,26.3	25.1,24.9,24.8,24.8
	Specific Cond.(uS/cm)	3070, 3080, 3040, 3080	2055, 2057, 2052, 2054
	Turbidity (NTU)	11.12,9.64,8.77,9.25	38.3,41.7,41.3,41.6
	TOC (ppm)	<1.0,1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	7.29,7.34,7.33,7.36	7.20,7.18,7.16,7.17
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02,<0.02	<0.02,<0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.109
	Cd (ppm)		<0.0005
	Pb (ppm)		<.003
	Hg (ppm)		<.0002
	Se (ppm)		<.003
	Ag (ppm)		<.01
	Cl (ppm)		525
	Mn (ppm)		<0.01
	Na (ppm)		393
	SO4 (ppm)		45
	Fe (ppm)		<0.01
	Phenolics (ppm)		<.005

New Landfill

		15th Year 3rd Qtr	16th Year 1st Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	10.77	10.63
U-3	(ft, msl)		
(Upgradient)	Temperature (celcius)	26.1,26.1,26.0,26.0	24.9,24.8,24.7,24.7
	Specific Cond.(uS/cm)	2987, 2996, 3010, 3020	2628, 2622, 2620, 2617
	Turbidity (NTU)	14.86,13.91,14.37,14.20	47.8, 51.4, 57.8, 59.0
	TOC (ppm)	1.2,1.4, 1.5, 1.4	<1.0,1.1, 1.1, 1.1
	pH (s.u.)	7.24,7.26,7.22,7.23	7.09,7.11,7.10,7.10
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02,<0.02	<0.02,<0.02
	Cr (ppm)*	<0.005,<0.005	<0.005,<0.005
	As (ppm)		<0.002
	Ba (ppm)		0.082
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.003
	Hg (ppm)		<0.0002
	Se (ppm)		<.003
	Ag (ppm)		<0.01
	Cl (ppm)		915
	Mn (ppm)		<0.01
	Na (ppm)		602
	SO4 (ppm)		47
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

New Landfill

		15th Year 3rd Qtr	16th Year 1st Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	26.52	27.39
D1UR	(ft, msl)		
(POC-	Temperature (celcius)	24.7,24.7,24.7,24.7	23.3,23.4,23.3,23.37
Supplemental)			
	Specific Cond.(uS/cm)	2810, 2820, 2810, 2810	2410, 2412, 2410, 2410
	Turbidity (NTU)	5.25, 4.661, 4.81, 4.63	5.4, 4.8, 5.7, 6.0
	TOC (ppm)	not required	not required
	pH (s.u.)	7.29 ,7.26,7.24,7.24	7.07,7.11,7.14,7.15
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02	<0.02
	Cr (ppm)		
	As (ppm)		
	Ba (ppm)		
	Cd (ppm)		
	Pb (ppm)		
	Hg (ppm)		
	Se (ppm)		
	Ag (ppm)		
	Cl (ppm)		
	Mn (ppm)		
	Na (ppm)		
	SO4 (ppm)		
	Fe (ppm)		
	Phenolics (ppm)		

New Landfill

		15th Year 3rd Qtr	16th Year 1st Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	5.62	6.04
D-4	(ft, msl)		
(POC)	Temperature (celcius)	25.7,25.7,25.6,25.6	23.8,23.8,23.8,23.8
	Specific Cond.(uS/cm)	1126, 1128, 1131, 1134	1227, 1230, 1227, 1228
	Turbidity (NTU)	7.34, 7.84, 7.52, 7.51	7.40 6.80 6.90 6.50
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.68 ,6.74,6.67,6.69	6.68,6.68,6.68,6.69
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)		0.008
	Ba (ppm)		0.063
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.003
	Hg (ppm)		<0.0002
	Se (ppm)		<0.003
	Ag (ppm)		<0.01
	Cl (ppm)		280
	Mn (ppm)		0.02
	Na (ppm)		169
	SO4 (ppm)		59
	Fe (ppm)		0.13
	Phenolics (ppm)		<0.005

New Landfill

		15th Year 3rd Qtr	16th Year 1st Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	5.45	5.89
D-5R	(ft, msl)		
(POC)	Temperature (celcius)	25.5,25.5,25.4,25.5	23.8,23.8,23.7,23.7
	Specific Cond.(uS/cm)	1645, 1658, 1661, 1665	1757, 1747, 1744, 1741
	Turbidity (NTU)	7.81, 8.42, 8.37, 7.94	57.0, 43.4, 40.4, 36.6
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.98 ,7.00,6.99,7.02	7.00,7.02,6.97,6.99
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)		<0.002
	Ba (ppm)		0.074
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.003
	Hg (ppm)		<0.0002
	Se (ppm)		<0.003
	Ag (ppm)		<0.01
	Cl (ppm)		410
	Mn (ppm)		0.15
	Na (ppm)		226
	SO4 (ppm)		95
	Fe (ppm)		0.27
	Phenolics (ppm)		<0.005

New Landfill

Well No.	Parameter	15th Year 3rd Qtr May 8, 2002	16th Year 1st Qtr. December 2, 2002
	Ground Water Elev.	5.37	5.79
D-6	(ft, msl)		
(POC)	Temperature (celcius)	26.1,26.2,26.1,26.0	24.0, 24.0,23.9,23.9
	Specific Cond.(uS/cm)	1162, 1166, 1171, 1173	1268, 1267, 1264, 1264
	Turbidity (NTU)	7.54, 7.29, 7.22, 7.10	8.70, 7.70, 7.90, 7.70
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.71 ,6.64,6.61,6.58	6.67,6.70,6.70,6.68
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)		<0.002
	Ba (ppm)		0.098
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.002
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		215
	Mn (ppm)		0.13
	Na (ppm)		165
	SO4 (ppm)		64
	Fe (ppm)		0.01
	Phenolics (ppm)		<0.005

New Landfill

		14th Year 1st Qtr	14th Year 3rd Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	5.33	5.75
D7U	(ft, msl)		
(POC)	Temperature (celcius)	25.5,25.5,25.4,25.4	23.9, 23.9,23.9,23.9
	Specific Cond.(uS/cm)	1214, 1215, 1213, 1215	1136, 1128, 1127, 1129
	Turbidity (NTU)	3.27, 3.62, 3.44, 3.33	12.4, 14.1, 13.7, 13.5
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.74 ,6.68,6.67,6.72	6.74,6.77,6.76,6.79
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02,<0.02	<0.02,<0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)	<0.002	
	Ba (ppm)	0.14	
	Cd (ppm)	<0.0005	
	Pb (ppm)	<0.002	
	Hg (ppm)	<0.0002	
	Se (ppm)	<0.002	
	Ag (ppm)	<0.01	
	Cl (ppm)	200	
	Mn (ppm)	<0.01	
	Na (ppm)	174	
	SO4 (ppm)	29	
	Fe (ppm)	<0.01	
	Phenolics (ppm)	<0.005	

New Landfill

		14th Year 1st Qtr	14th Year 3rd Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	5.3	5.72
D7L	(ft, msl)		
(POC)	Temperature (celcius)	25.5,25.5,25.4,25.5	24.2, 24.1,24.0,24.0
	Specific Cond.(uS/cm)	1220, 1224, 1231, 1225	1217, 1215, 1215, 1214
	Turbidity (NTU)	2.68, 3.11, 3.07, 2.75	15.9, 14.5, 14.1, 14.0
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.77 ,6.77,6.78,6.74	6.77,6.72,6.70,6.70
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02,<0.02	<0.02,<0.02
	Cr (ppm)	<0.005,<0.005	<0.005,<0.005
	As (ppm)	<0.002	
	Ba (ppm)	0.13	
	Cd (ppm)	<0.0005	
	Pb (ppm)	<0.002	
	Hg (ppm)	<0.0002	
	Se (ppm)	<0.002	
	Ag (ppm)	<.01	
	Cl (ppm)	210	
	Mn (ppm)	<0.01	
	Na (ppm)	146	
	SO4 (ppm)	48	
	Fe (ppm)	<0.01	
	Phenolics (ppm)	<0.005	

New Landfill

		8th Year 3rd Qtr	9th Year 1st Qtr.
	Parameter	May 8, 2002	December 2, 2002
Well No.			
	Ground Water Elev.	5.29	5.69
D-8	(ft, msl)		
(POC)	Temperature (celcius)	25.4,25.3,25.4,25.4	24.1, 24.0,24.0,24.0
	Specific Cond.(uS/cm)	1128, 1128, 1131, 1129	1122, 1127, 1124, 1118
	Turbidity (NTU)	1.74, 2.03, 2.11, 2.19	16.4, 14.7, 12.1, 12.9
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.66 ,6.69,6.70,6.68	6.74,6.71,6.74,6.76
	AN (ppm)	<0.008,<0.008	<0.008,<0.008
	ACN (ACN)	<0.015,<0.015	<0.015,<0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)	<0.002	
	Ba (ppm)	0.18	
	Cd (ppm)	<0.0005	
	Pb (ppm)	<0.002	
	Hg (ppm)	<0.0002	
	Se (ppm)	<.0.002	
	Ag (ppm)	<0.01	
	Cl (ppm)	186	
	Mn (ppm)	<0.01	
	Na (ppm)	142	
	SO4 (ppm)	40	
	Fe (ppm)	<0.01	
	Phenolics (ppm)	<0.005	

TCEQ Unit 004

Old Landfill

Old Landfill

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-6A (UG)	Ground Water Elev. (ft, msl)	4.3	3.65
	Temperature (celcius)	23.8,23.8,23.9,23.8	24.5, 24.4,24.5,24.5
	Specific Cond.(uS/cm)	1246, 1240, 1243, 1248	1266, 1268, 1272, 1271
	Turbidity (NTU)	2.48, 2.87, 2.66, 2.54	2.99, 2.78, 2.85, 2.74
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.91 ,6.90,6.93,6.91	6.96,6.99,7.01,7.02
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005,<0.005
	As (ppm)		<0.002
	Ba (ppm)		0.195
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Chloride (ppm)		140
	Mn (ppm)		<0.01
	Na (ppm)		123
	SO4 (ppm)		35
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-7 (POC)	Ground Water Elev. (ft, msl)	2.17	-0.67
	Temperature (celcius)	24.3,24.3,24.3,24.3	24.6, 24.7,24.6,24.7
	Specific Cond.(uS/cm)	1965, 1967, 1965, 1966	1971, 1968, 1968, 1965
	Turbidity (NTU)	3.86, 3.77, 3.92, 3.81	3.67, 3.82, 3.96, 3.93
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.53 ,6.53, 6.55, 6.55	6.55,6.56,6.57,6.57
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.171
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		300
	Mn (ppm)		<0.01
	Na (ppm)		124
	SO4 (ppm)		29
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-8A	Ground Water Elev.	1.58	-1.88
(POC)	(ft, msl)		
	Temperature (celcius)	22.9,23.0,23.0,23.1	24.0, 24.0,24.1,24.0
	Specific Cond.(uS/cm)	3120, 3130, 3120, 3130	3140, 3140, 3130, 3140
	Turbidity (NTU)	1.54, 1.87, 1.89, 1.69	2.77, 2.57, 2.55, 2.50
	TOC (ppm)	1.8, 18, 1.8,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.81 ,6.87,6.91,6.89	6.86,6.89,6.89,6.90
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02,<0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.195
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		640
	Mn (ppm)		<0.01
	Na (ppm)		347
	SO4 (ppm)		120
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-9 (POC)	Ground Water Elev. (ft, msl)	1.53	-1.93
	Temperature (celcius)	24.2,23.8,23.9,23.7	24.4, 24.3,24.3,24.3
	Specific Cond.(uS/cm)	1563, 1572, 1582, 1588	1577, 1579, 1575, 1577
	Turbidity (NTU)	3.42, 3.36, 3.44, 3.48	3.52, 3.37, 3.42, 3.42
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.96 ,7.06,7.04,7.08	7.10,7.08,7.10,7.11
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.129
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		120
	Mn (ppm)		<0.01
	Na (ppm)		210
	SO4 (ppm)		60
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-10 (UG)	Ground Water Elev. (ft, msl)	4.06	3.48
	Temperature (celcius)	23.3,23.3,23.3,23.3	24.4, 24.4,24.5,24.5
	Specific Cond.(uS/cm)	1180, 1184, 1185, 1183	1193, 1197, 1197, 1195
	Turbidity (NTU)	3.86, 3.77, 3.92, 3.81	3.67, 3.82, 3.96, 3.93
	TOC (ppm)	1.7, 1.4, 1.4, 1.2	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.65 ,6.68,6.66,6.68	6.58,6.60,6.61,6.61
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02,<0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.352
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		140
	Mn (ppm)		0.34
	Na (ppm)		84
	SO4 (ppm)		33
	Fe (ppm)		1.17
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-11 (POC)	Ground Water Elev. (ft, msl)	1.78	-1.52
	Temperature (celcius)	22.8,22.9,23.0,23.0	24.3, 24.2,24.2,24.2
	Specific Cond.(uS/cm)	1532, 1535, 1545, 1545	1541, 1546, 1548, 1549
	Turbidity (NTU)	8.573, 8.77, 9.11, 8.73	7.91, 7.84, 7.89, 7.95
	TOC (ppm)	1.7, 1.1, 1.1,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.98 ,7.07,7.08,7.04	7.00,7.02,7.00,7.02
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.494
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		280
	Mn (ppm)		<0.01
	Na (ppm)		129
	SO4 (ppm)		43
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

Well No.	Parameter	14th Year 3rd Qtr March 8, 2002	15th Year 1st Qtr September 12, 2002
TW-12	Ground Water Elev.	2.27	-0.51
(POC)	(ft, msl)		
	Temperature (celcius)	23.5,23.4,23.5,23.6	24.6, 24.6,24.6,24.6
	Specific Cond.(uS/cm)	1549 1547, 1544, 1544	1549, 1552, 1552, 1555
	Turbidity (NTU)	4.06, 3.87, 3.83, 3.87	4.31, 4.15, 4.10, 4.11
	TOC (ppm)	<1.0,<1.0,<1.0,<1.0	<1.0,<1.0,<1.0,<1.0
	pH (s.u.)	6.34 ,6.40,6.42,6.80	6.42,6.45,6.46,6.47
	AN (ppm)	<0.008, <0.008	<0.008, <0.008
	ACN (ACN)	<0.015, <0.015	<0.015, <0.015
	CN (ppm)	<0.02, <0.02	<0.02, <0.02
	Cr (ppm)	<0.005, <0.005	<0.005, <0.005
	As (ppm)		<0.002
	Ba (ppm)		0.57
	Cd (ppm)		<0.0005
	Pb (ppm)		<0.005
	Hg (ppm)		<0.0002
	Se (ppm)		<0.002
	Ag (ppm)		<0.01
	Cl (ppm)		240
	Mn (ppm)		<0.01
	Na (ppm)		144
	SO4 (ppm)		40
	Fe (ppm)		<0.01
	Phenolics (ppm)		<0.005

ATTACHMENT II

Graphs of Ground Water Parameters

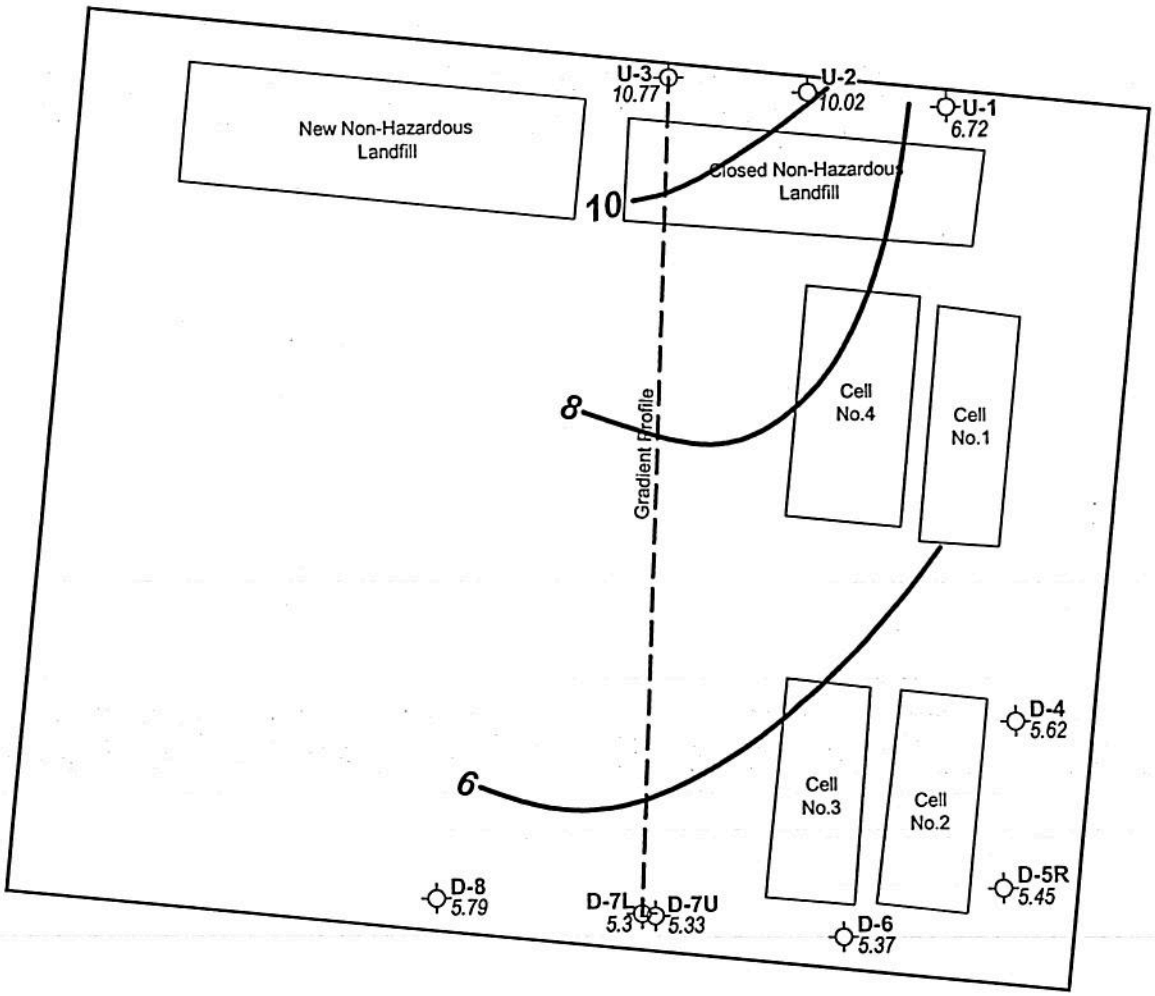
Two groups of graphs are enclosed. The first group is for those parameters whose concentrations were always greater than detection limits. The second group is for parameters that had concentrations both above and below detection limits. In these cases, the below detection value is graphed at the detection limit. Graphs have not been constructed where a parameter for a well was always below detection limits. Data for 2002 is contained in Section I of this report and the data for 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, and 2001 are contained in previous annual reports.

SECTION IV

Potentiometric Maps and Flow Calculations

TCEQ Unit 027

New Landfill



Note:
The U-3 to D-7L apparent hydraulic gradient is calculated to be 0.008 ft/ft. Assuming a hydraulic conductivity of 105 ft/yr and an aquifer porosity of 0.37, the U-3 to D-7L apparent average linear velocity is calculated to be 2.1 ft/yr.

Scale in Feet

0 80 160

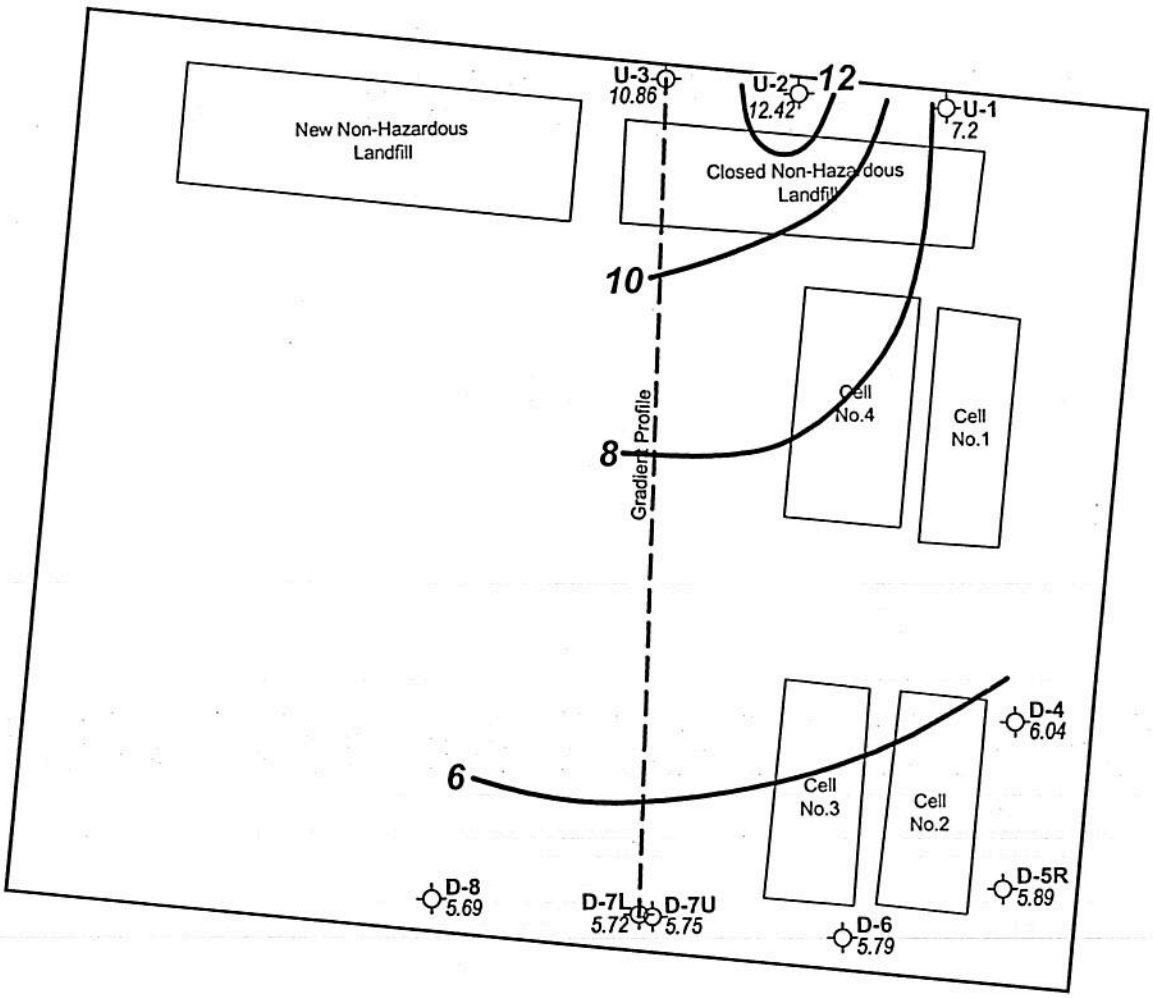
BP GREEN LAKE

Figure 1

NEW LANDFILL POTENTIOMETRIC SURFACE MAY 7, 2002

PROJECT: 080058	BY: ZGK	REVISIONS
DATE: JAN., 2003	CHECKED: MKW	

MFG, INC.
ENVIRONMENTAL SCIENCES AND ENGINEERING SERVICES



Note:
The U-3 to D-7L apparent hydraulic gradient is calculated to be 0.007 ft/ft. Assuming a hydraulic conductivity of 105 ft/yr and an aquifer porosity of 0.37, the U-3 to D-7L apparent average linear velocity is calculated to be 2.0 ft/yr.

Scale in Feet

0 80 160

BP GREEN LAKE

Figure 2

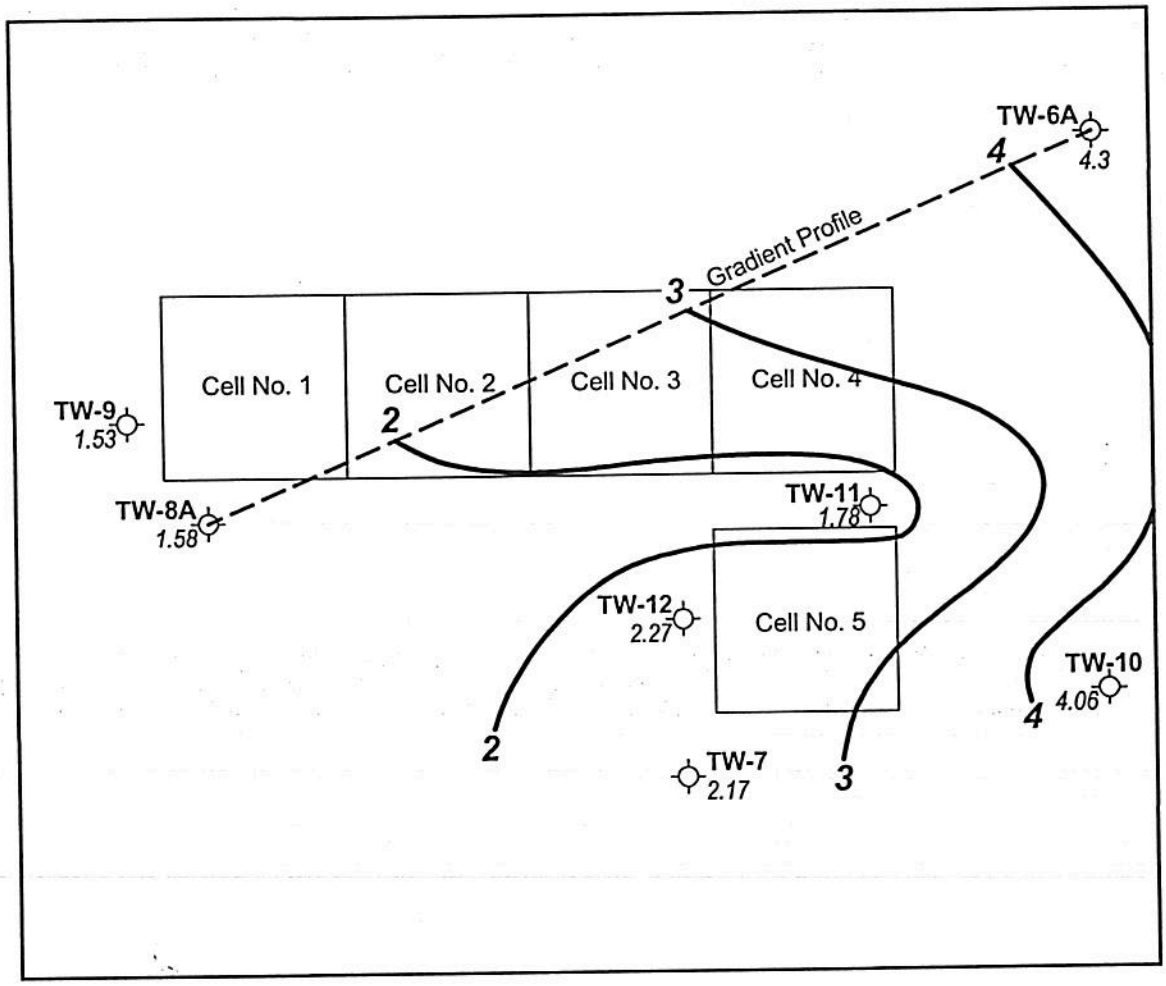
NEW LANDFILL POTENTIOMETRIC SURFACE DECEMBER 3, 2002

PROJECT: 080058	BY: ZGK	REVISIONS
DATE: JAN., 2003	CHECKED: MKW	

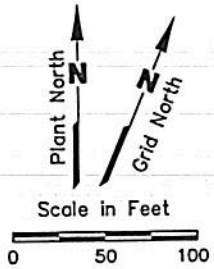
MFG, INC.
ENVIRONMENTAL SCIENCES AND ENGINEERING SERVICES

TCEQ Unit 004

Old Landfill



Note:
The TW-6A to TW-8A apparent hydraulic gradient is calculated to be 0.005 ft/ft. Assuming a hydraulic conductivity of 105 ft/yr and an aquifer porosity of 0.37, the TW-6A to TW-8A apparent velocity is calculated to be 1.5 ft/yr.



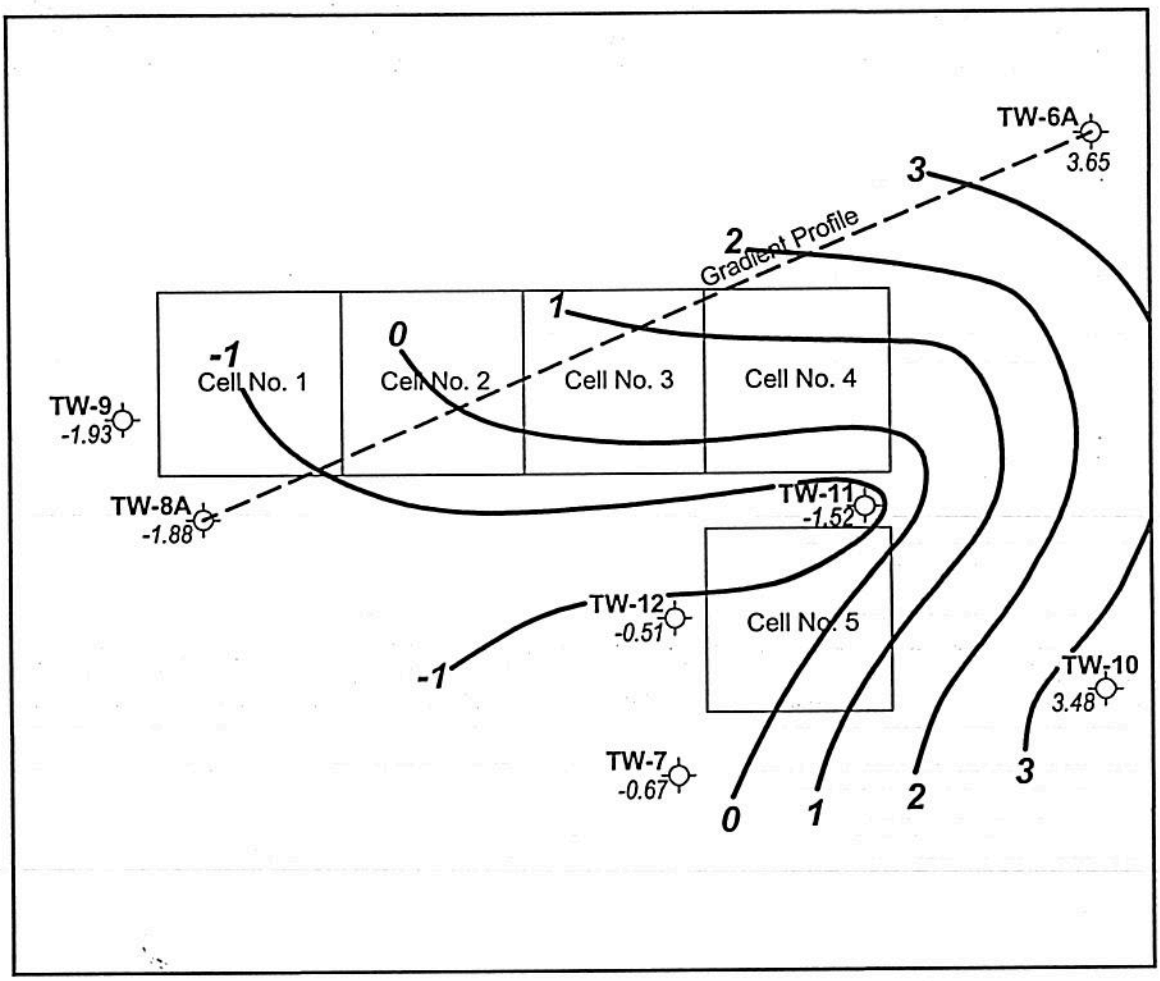
BP GREEN LAKE

Figure 1

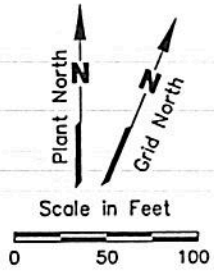
OLD LANDFILL POTENTIOMETRIC SURFACE MARCH 8, 2002

PROJECT: 080058	BY: ZGK	REVISIONS
DATE: JAN., 2003	CHECKED: MKW	

MFG, INC.
ENVIRONMENTAL SCIENCES AND ENGINEERING SERVICES



Note:
The TW-6A to TW-8A apparent hydraulic gradient is calculated to be 0.01 ft/ft. Assuming a hydraulic conductivity of 105 ft/yr and an aquifer porosity of 0.37, the TW-6A to TW-8A apparent velocity is calculated to be 3.0 ft/yr.



BP GREEN LAKE

Figure 2

OLD LANDFILL
POTENTIOMETRIC SURFACE
SEPTEMBER 12, 2002

PROJECT: 080058	BY: ZGK	REVISIONS
DATE: JAN., 2003	CHECKED: MKW	

MFG, INC.
ENVIRONMENTAL SCIENCES AND ENGINEERING SERVICES

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2002

GROUNDWATER PRACTICAL QUANTITATION LIMITS

ANALYTICAL RESULTS

PROVISION VI.G.2

	Minimum Detection Limit (mg/L)	Practical Quantitation Limit (mg/l)	Permit Limit (mg/L)
AN	0.002	0.005	0.01
Cr	0.0004	0.001	0.01
CN	0.005	0.016	0.03
Aceto	0.002	0.007	0.10

Provision VII.E.8.

Landfill Closure

Closure Summary:

No permitted hazardous waste cell closures occurred in 2002.

Provision VI.E.8.

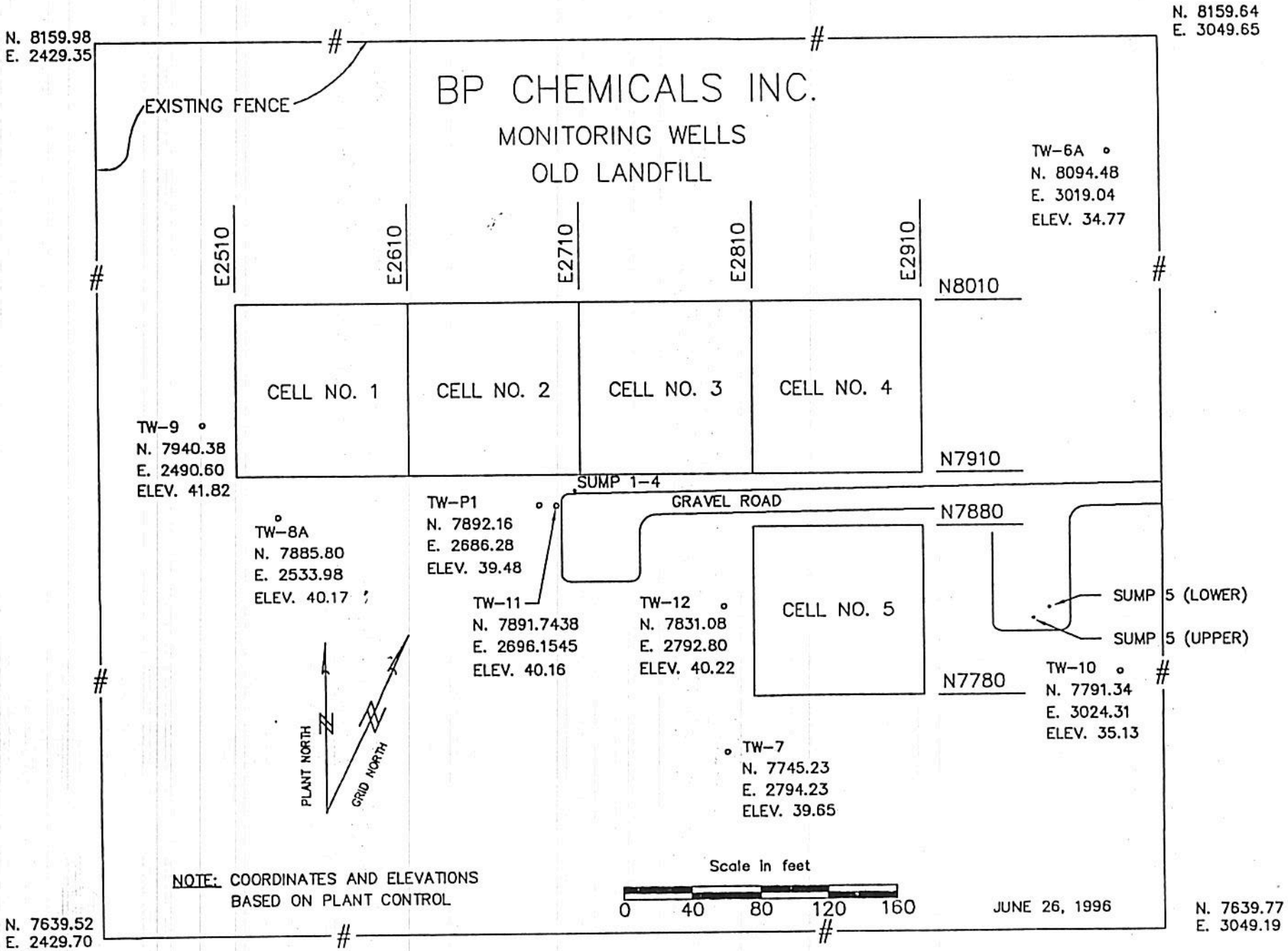
Summary of Construction/Expansion
of Hazardous Waste Facility Units

There were no new cell constructions or expansions during the 2002 year.

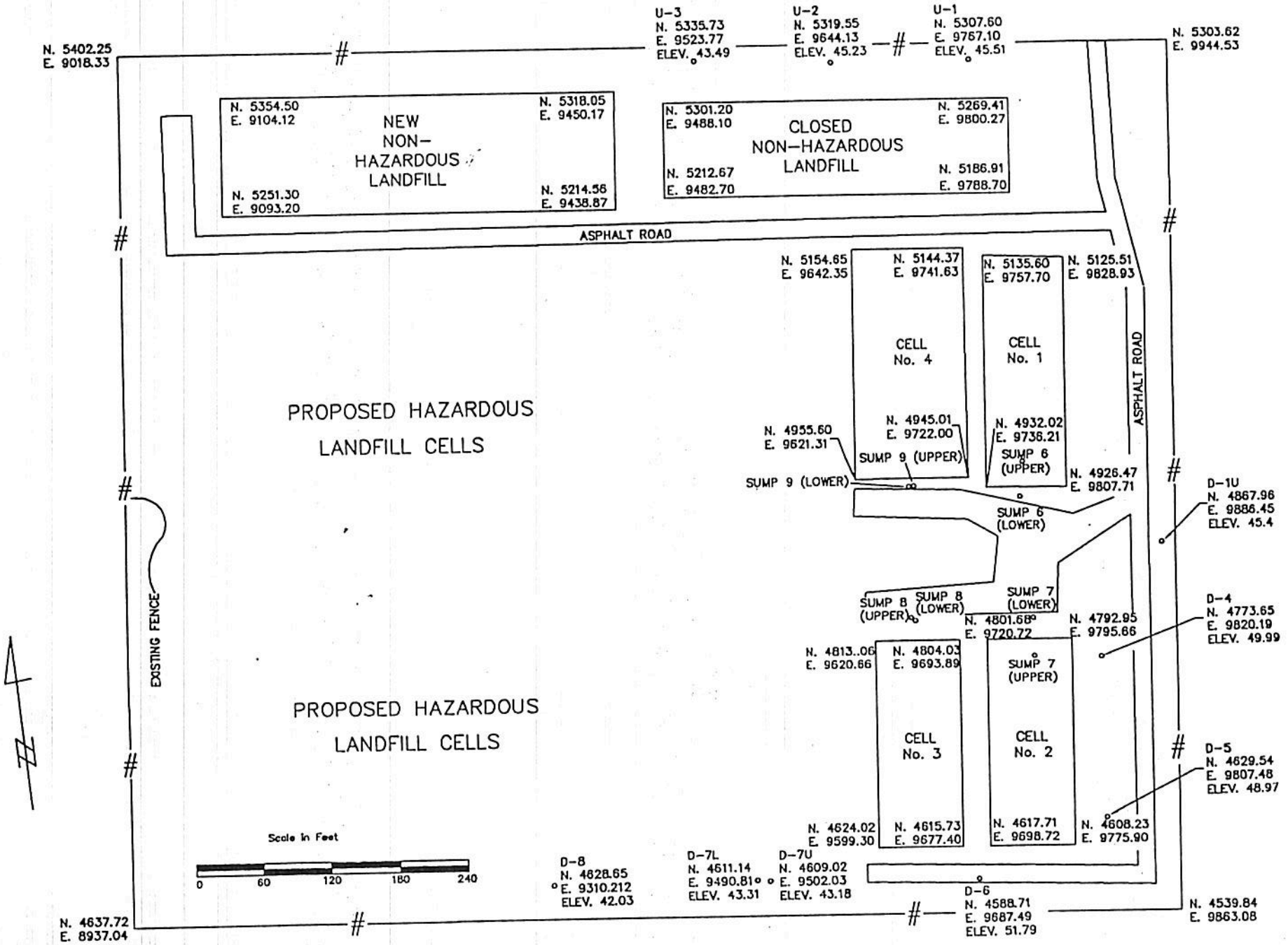
Cell 9 of TCEQ Unit 027 was placed into service on September 1, 1993.

Provisions VI.G.4.

Landfill Maps


N. 8159.98
E. 2429.35
N. 8159.64
E. 3049.65
BP CHEMICALS INC.
MONITORING WELLS
OLD LANDFILL
EXISTING FENCE
TW-6A
N. 8094.48
E. 3019.04
ELEV. 34.77
E2510
E2610
E2710
E2810
E2910
N8010
CELL NO. 1
CELL NO. 2
CELL NO. 3
CELL NO. 4
TW-9
N. 7940.38
E. 2490.60
ELEV. 41.82
N7910
SUMP 1-4
TW-P1
N. 7892.16
E. 2686.28
ELEV. 39.48
GRAVEL ROAD
N7880
TW-8A
N. 7885.80
E. 2533.98
ELEV. 40.17
TW-11
N. 7891.7438
E. 2696.1545
ELEV. 40.16
TW-12
N. 7831.08
E. 2792.80
ELEV. 40.22
CELL NO. 5
SUMP 5 (LOWER)
SUMP 5 (UPPER)
N7780
TW-10
N. 7791.34
E. 3024.31
ELEV. 35.13
TW-7
N. 7745.23
E. 2794.23
ELEV. 39.65
PLANT NORTH
GRID NORTH
NOTE: COORDINATES AND ELEVATIONS
BASED ON PLANT CONTROL
Scale in feet
0 40 80 120 160
JUNE 26, 1996
N. 7639.52
E. 2429.70
N. 7639.77
E. 3049.19

BP CHEMICALS
MONITORING WELLS
NEW LANDFILL



8//

Provision II.B.7.
40 CFR 264.75 (g)

Summary of Closure/Post-Closure Cost Estimate
for Permitted Units

The financial assurance for permitted units was adjusted by 3% to account for inflation during 2002.

Closure	$1,778,752	x 1.03	=	$1,832,115
Post Closure	$1,604,594	x 1.03	=	$1,652,732

Provision II.B.7

Disposal Summary

The waste disposal summary is attached along with a map of the grid system used for disposal. No waste was disposed of into TCEQ unit 027.

Cell #9 Locations
(Unit 027)

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32

North ↓

CELL 9
(Cell 04 of Permitted Unit 027)
2002 Disposal Record

Description (yds)	Cell Number Waste Disposed In 9	10	11	12	Total Disposed
Class I Hazardous Waste					
Contaminated Soil	0	0	0	0	0
Contaminated Debris	0	0	0	0	0
Total Disposed 2002 (yds)					0

Landfill Capacity (yds)	2,900.00
Volume Disposed 2002 (yds)	0
Volume Disposal Previous (yds)	1,186.25
Remaining Capacity in Cell 9 (yds)	1,713.75

Provision VII.E.8

TCEQ unit 006 was clean closed in 1988. This incinerator was not used for burning liquid hydrogen cyanide in 2002.

HW 32164 IN

Texas Commission on Environmental Quality
Investigation Report
BP CHEMICALS INC
CN600124531

BP CHEMICALS GREEN LAKE PLANT
RN100210038

Investigation # 372034 **Incident #**

Investigator: MATT NERREN

Site Classification
LARGE QUANTITY GENERATOR
CONTAINER STORAGE AREA
IHW LANDFILL
INJECTION WELL
SUMP
TANK (SURFACE)
WASTE TREATMENT FACILITY

Conducted: 02/16/2005 -- 02/17/2005

NAIC Code: 325199
SIC Code: 1629

Program(s):
INDUSTRIAL AND HAZARDOUS WASTE STORAGE
INDUSTRIAL AND HAZARDOUS WASTE GENERATION
INDUSTRIAL AND HAZARDOUS WASTE PROCESSING
INDUSTRIAL AND HAZARDOUS WASTE DISPOSAL

Investigation Type : Compliance Investigation

Location : State Hwy 185 approx. 7 miles north of Green Lake

Additional ID(s) :
50143
TXD000751172
32164

Address: 13050 STATE HIGHWAY 185 N; PORT LAVACA, TX 77979

Activity Type : IHWTSD - CEI of treatment/storage/disposal facility

Principal(s) :

Role	Name
RESPONDENT	BP CHEMICALS INC

Contact(s) :

Role	Title	Name	Phone	
Regulated Entity Contact	ENVIRONMENTAL MANAGER	MR VAN BOONE	Fax Work	(361) 552-8229 (361) 552-7543 x. 642
Regulated Entity Mail Contact	PLANT MANAGER	MR JOHN HARVEY III	Work	(361) 552-8606

Other Staff Member(s) :

Role	Name
QA REVIEWER	PHYLLIS CUNNINGHAM
SUPERVISOR	SUSAN CLEWIS

Associated Check List

Checklist Name	Unit Name
IHW CEI GENERAL FACILITY	IHW Gen
IHW CONTAINER STORAGE AREA - FY05	CSA
IHW EXISTING TANKS	Tanks
IHW LAND DISPOSAL RESTRICTIONS FOR GENERA	LDR
IHW PERMIT COMPLIANCE	Permit
IHW PERMITTED CONTAINER STORAGE AREA	Permit CSA

IHW PERMITTED FACILITY GENERAL STANDARDS	Permit Gen Stand
IHW PRE-INVESTIGATION	Pre Invest
IHW GENERIC OTHER ISSUES OR VIOLATIONS (10 I	Other Issues

Investigation Comments :

INTRODUCTION
On February 16 and 17, 2005, a Compliance Evaluation Investigation was conducted at BP Chemicals' Green Lake Facility to assess the hazardous waste management practices for the permitted facility.

The Green Lake Facility is located in Calhoun County on State Highway 185, six and one-half miles south of Bloomington, Texas. BP representative, Mr. Van Boone, Health, Safety and Environmental Manager with BP Chemical, participated in this investigation. Mr. Boone was contacted February 8, 2005, to schedule the investigation.

An exit interview was conducted on February 17, 2005. Mr. Boone was informed that one area of concern was noted. Mr. Harvey, BP Chemical Plant Manager, stopped by but was scheduled for another appointment.

GENERAL FACILITY AND WASTE PROCESS INFORMATION
BP Chemicals' Green Lake Facility is an organic chemical manufacturing facility that produces acrylonitrile, acetonitrile and acetone cyanohydrin. The plant also operates a marine shipping and receiving terminal on the Victoria Barge Canal. This site is a permitted treatment storage and disposal facility (TSD) for waste generated on-site (HW Permit No. 50143).

Process wastewater generated at the plant, carries numerous hazardous waste codes and is treated for disposal into one of three permitted on-site injection wells. Solids removed from the process wastewater are also listed and handled by ONYX Environmental by incineration at their Port Arthur facility. Initially, BP disposed of the solids in their on-site landfills however, due to Land Ban Requirements the solid waste is now incinerated. Wastewaters from non-process areas are non-hazardous and are treated and discharged through TPDES permitted outfalls.

Permitted waste management units evaluated during this investigation included one Container Storage Area (CSA) - NOR No. 017, and two hazardous waste landfills (one active - NOR No. 027 and one closed - NOR No. 004). The active landfill is seldom used due to the advent of Land Ban Requirements. The following active, permit exempt waste management units were also evaluated: five less than 90-day CSA's, 18 less than 90-day pre-injection tanks, one non-hazardous landfill and 14 Satellite Accumulation Areas (SAA's).

A reference to the TCEQ Central Office insurance coverage database maintained by Mr. Stoebner, confirms that BP Chemicals maintains liability insurance coverage for sudden and non-sudden accidental occurrences and for closure and post-closure cost estimates in the required amounts. Financial assurance is provided by corporate guarantee. Inflation adjusted amounts for coverage will be due March 30, 2005.

During the groundwater investigation, one Area of Concern was noted at the Old Landfill (NOR 004). According to the groundwater sampling results of September 21, 2004, the Groundwater Monitoring Well (MW)-TW-7 had an exceedance of cyanide concentrations. The monitoring well is located down gradient of Cell No. 5. Regulatory action levels for the presence of cyanide, listed in Permit 50143 are 0.03 ppm. The reading taken at MW- TW-7 was 0.06 ppm for the presence of cyanide. Facility personnel are aware of the situation and working with the TCEQ's Permitting Section in Austin to resolve the problem.

CONCLUSION
One area of concern was noted during this investigation. A general compliance letter was transmitted to the facility.

No Violations Associated to this Investigation

Areas of Concern

Description	Additional Comments
Item #1	During the groundwater investigation, one Area of Concern was noted at the Old Landfill (NOR 004). According to the groundwater sampling results of September 21, 2004, the Groundwater Monitoring Well (MW)-TW-7 had an exceedance of cyanide concentrations. The monitoring well is located down gradient of Cell No. 5. Regulatory action levels for the presence of cyanide, listed in Permit 50143 are 0.03 ppm. The reading taken at MW- TW-7 was 0.06 ppm for the presence of cyanide. Facility personnel are aware of the situation and working with TCEQ's Permitting Section in Austin to resolve the problem.

Signed _____ Environmental Investigator Date 4/1/05

Signed _____ Supervisor Date 4/1/05

Attachments: (in order of final report submittal)

___Enforcement Action Request (EAR)
__✓Letter to Facility (specify type) : bcs. Corr
Investigation Report
___Sample Analysis Results
___Manifests
__✓NOR - A
__✓Maps, Plans, Sketches - B
___Photographs
___Correspondence from the facility
__✓Other (specify):
Tanks Table - C
CSA Table - D
Exit Interview Form - E
RCRA Groundwater Mont. - F

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SWR No. 32164
EPA ID No. TXD000751172

Attachment A
Notice of Registration

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Notice of Registration
Industrial and Hazardous Waste

32164 BP Chemicals Inc

Solid Waste Registration Number: 32164 EPA Id: TXD000751172

Company Name: BP Chemicals Inc
Site Name: BP Chemicals Green Lake Complex
Site Location: Hwy 185 6.5 Mi S of, Bloomington Texas, Port Lavaca, TX
Contact: Harvey, John
Region: 14
County: 29 Calhoun
Title: Works General Manager
Initial Registration Date: 11/15/1981
Last Amendment Date: 06/03/2004
Last Date NOR Computer update: 01/12/2005
Phone: 361-552-7543

Mailing Address: PO Box 659
Port Lavaca, TX 77979-0659

Site Street Address: Hwy 185 6.5 Mi S of
Bloomington Texas
Port Lavaca, TX 77979

Registration Status: Active HW Permit #: 50143
Registration Type: Generator
Generator Type: Industrial
Reporting Method: STEERS
Hazardous Waste Generation Status: Large Quantity Generator
This registration has the following merged registrations: 68217

Business Description: Chemical Manufacturer Received written request for company name change 12-29-2004. Site has a HW permit #50143. Sent to permits 1-4-2005 JH Spoke to EJ Biskup in Permits--he wanted to make sure we don't make any changes without Permit approval. 1-10-2005 JH

NAICS Code: 325199 All Other Basic Organic Chemical Manufacturing
Tax Identification #: 10423094365
Handler Status:

Operator Information
Name: BP Chemicals Inc
Phone: 361-552-7543
Address: PO Box 659
Port Lavaca, TX, 77979-0659

Owner Information
Name: BP Chemicals Inc
Phone: 361-552-7543
Address: PO Box 659
Port Lavaca, TX, 77979-0659

As of 06/03/2004 - the next unassigned sequence number for WASTES is 0904 and the next unassigned sequence number for UNITS is 063.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 1, 2005

Mr. John Harvey III
Plant Manager
BP Chemicals Inc.
P.O. Box 659
Port Lavaca, Texas 77979

Re: Compliance Evaluation Investigation at:
BP Chemicals Inc. Green Lake Complex, Highway 185, 6.5 miles South of Bloomington, Calhoun County, Texas
Solid Waste Registration No. 32164, EPA ID No. TXD000751172
Hazardous Waste Permit No. 50143

Dear Mr. Harvey,

On February 16 and 17, 2005, Mr. Matt Nerren of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region 14, Office conducted an investigation of the above referenced facility to evaluate compliance with applicable industrial hazardous waste requirements. No violations were documented during the investigation.

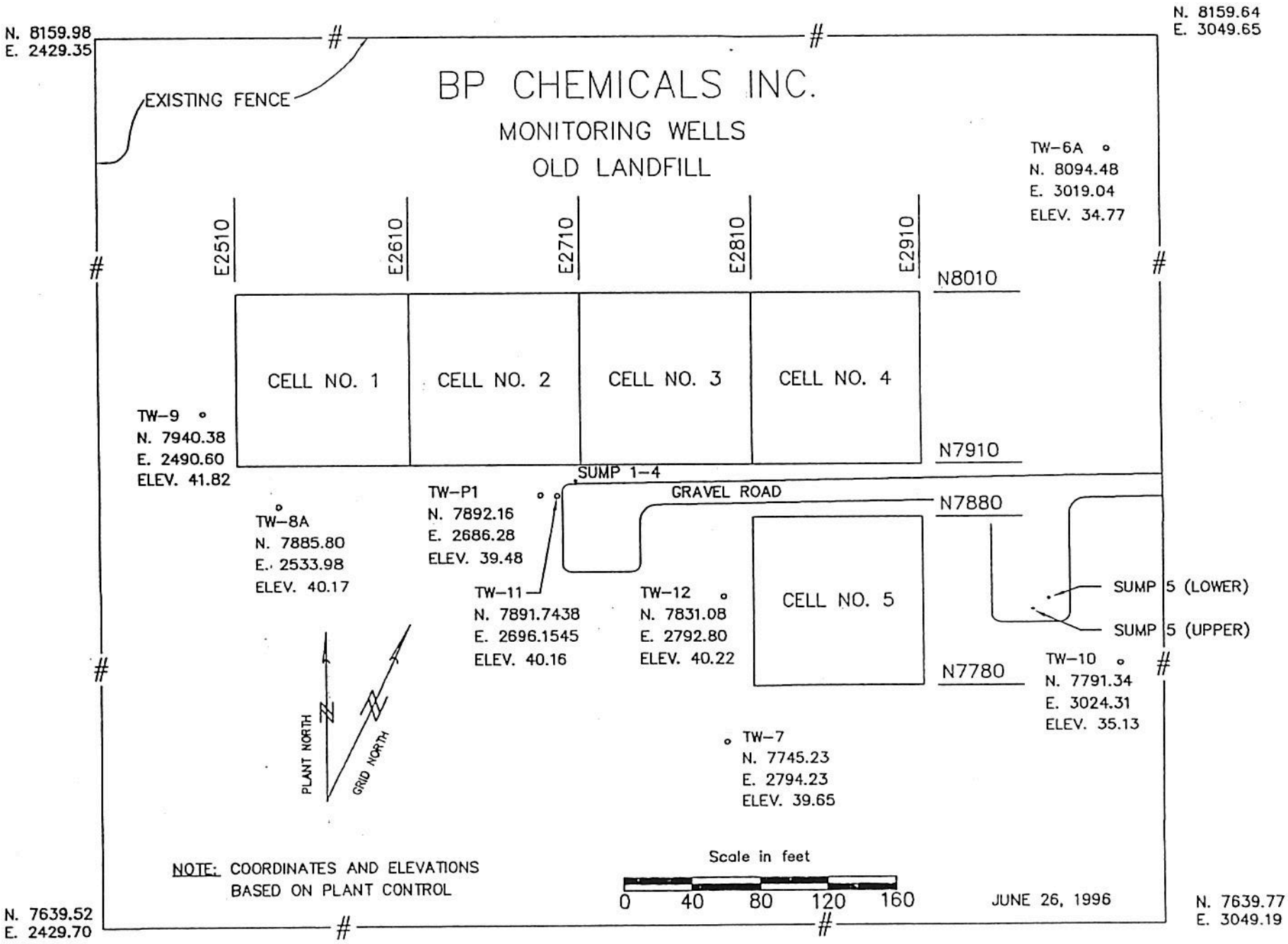
The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Matt Nerren in the Corpus Christi Region Office at (361) 825-3141.

Sincerely,

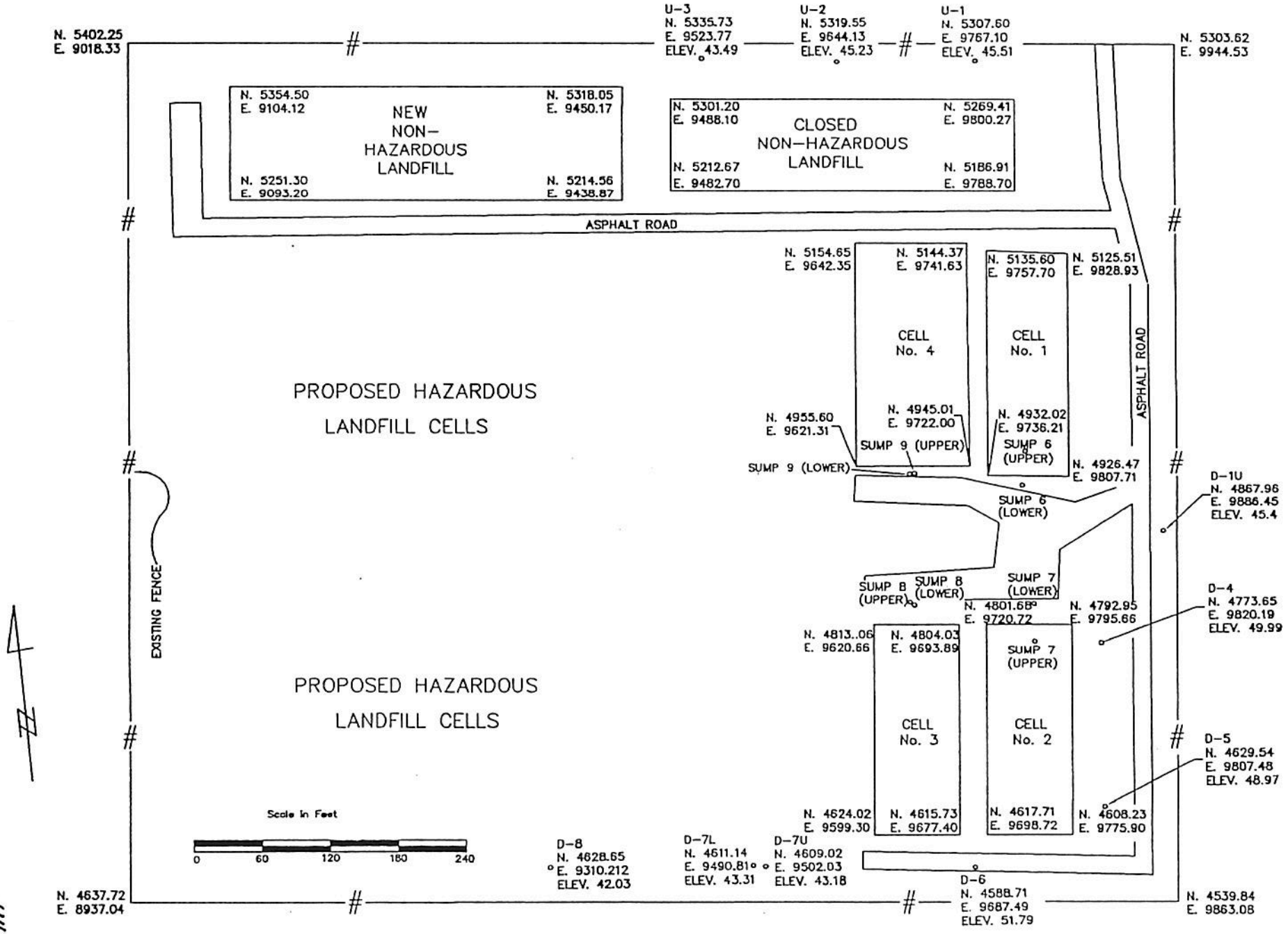
Susan Clewis

Susan Clewis
Waste Section Manager
Corpus Christi Region Office

SC/mn


N. 8159.98
E. 2429.35
N. 8159.64
E. 3049.65
BP CHEMICALS INC.
MONITORING WELLS
OLD LANDFILL
EXISTING FENCE
TW-6A
N. 8094.48
E. 3019.04
ELEV. 34.77
E2510
E2610
E2710
E2810
E2910
N8010
CELL NO. 1
CELL NO. 2
CELL NO. 3
CELL NO. 4
TW-9
N. 7940.38
E. 2490.60
ELEV. 41.82
N7910
SUMP 1-4
GRAVEL ROAD
N7880
TW-8A
N. 7885.80
E. 2533.98
ELEV. 40.17
TW-P1
N. 7892.16
E. 2686.28
ELEV. 39.48
TW-11
N. 7891.7438
E. 2696.1545
ELEV. 40.16
TW-12
N. 7831.08
E. 2792.80
ELEV. 40.22
CELL NO. 5
SUMP 5 (LOWER)
SUMP 5 (UPPER)
N7780
TW-10
N. 7791.34
E. 3024.31
ELEV. 35.13
TW-7
N. 7745.23
E. 2794.23
ELEV. 39.65
PLANT NORTH
GRID NORTH
NOTE: COORDINATES AND ELEVATIONS
BASED ON PLANT CONTROL
Scale in feet
0 40 80 120 160
JUNE 26, 1996
N. 7639.52
E. 2429.70
N. 7639.77
E. 3049.19

BP CHEMICALS
MONITORING WELLS
NEW LANDFILL



BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SWR No. 32164
EPA ID No. TXD000751172

Attachment C
Tanks Table

TANKS TABLE
BP Chemicals Inc.

Tank Fac Status & Permit #	Tank Capacity (Gallons)	Tank Identity	NOR Facility Number	Location	New (N) or Existing (E) Tank	Date put into Service --- Date due 2d Cont.	Waste Handled (NOR Waste Stream #) Violation of Rules, list with Section & Q # only
E	3300	Sluice Tanks (2) FD-9101A	028	Deep Well Pretreatment (Two tanks)	E	1980 1995	See NOR
E	160,000	Quench Water Clarifier FB-701	015	Deep Well Pretreatment	E	1980 1995	See NOR
E	65,000	WW Tank FB-91001C	001	Deep Well Pretreatment	E	1980 1995	See NOR
E	650,000	WW Tank Surface FB-9701A	013	Deep Well Pretreatment	E	1980 1995	See NOR
E	650,000	WW Tank (Surface) FB-9701B	014	Deep Well Pretreatment	E	1980 1995	See NOR
E	1500	Pre-Coat Tank near D.E. Filters	019	Deep Well Pretreatment	E	1995 1995	See NOR
E	1500	Deep Well Sump	022	Deep Well Pretreatment	E	1982 1997	See NOR
E	90,000	Deep Well Sump	024	Deep Well Pretreatment	E	1980 1995	See NOR
E	1000000	WW Tank	036	Deep Well Pretreatment	E	1984 1999	See NOR
E	1000000	WW Tank	037	Deep Well Pretreatment	E	1982 1997	See NOR
E	85,000	Spent Caustic Tank FB-9704	038	Deep Well Pretreatment	E	1980 1995	See NOR
E	100000	Deep Well Sump	040	Deep Well Pretreatment	E	1982 1997	See NOR
E	27000	Deep Well Sump	049	Deep Well Pretreatment	E	1982 1997	See NOR
E	13000	Deep Well Sump	051	Deep Well Pretreatment	E	1982 1997	See NOR

				Tanks Table Continued BP Chemicals Inc.			
E	50	Decon Sump	045	Deep Well Pretreatment	E	1995	See NOR
						1995	
E	200	Catalyst Plant Sump	053	Catalyst Plant	E	1999	See NOR
						1999	
E	6000	Clarifier Overflow Tank FB-9702	016	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	25000	Regen. Collection Tank	61	Deep Well Pretreatment	E	2000	See NOR

NOTE: @ Identify tanks as to Facility status, i.e. P-permitted, I-interim status, E- exempt 90-day storage, S-small quantity generator, and NH-nonhazardous

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SWR No. 32164
EPA ID No. TXD000751172

Attachment D
Container Storage Area and
Satellite Accumulation Area Table

CONTAINER STORAGE AREAS (CSAs) and SATELLITE ACCUMULATION AREAS (SAAs)

BP Chemical Inc.

[a]NOR Fac. No.	Permit Unit No.	Permit Capacity	Name/ Location	Contain. Req.?	Wastes Managed (TX. Waste Codes)	Number and Types of Containers Present (at time of INVESTIGATION)	Violation(s) / Area(s) of Concern
005	N/A	N/A	Contractor CSA	No	See NOR	70 empty 55 gallon drums	none
017	002	22,000 gals.	Quench water clarifier CSA	Yes	See NOR	20- 55 gallon drums of hazardous solids.	none
025	N/A	N/A	Polishing unit CSA	No	See NOR	No containers present	none
041	N/A	N/A	Process Lab CSA	No	See NOR	Two partially full 55 gallon drums of lab waste.	none
043	N/A	N/A	Main lab CSA	No	See NOR	Two 55 gallon drums for lab waste. One empty and the other is partially full.	none
056	N/A	N/A	Cat plant CSA	No	See NOR	16-55 gallon drums of catalyst waste.	none
N/A	N/A	N/A	SAA/ Warehouse	No	N/A	One partially full, 55 gallon drum of contaminated debris	none
N/A	N/A	N/A	SAA/ Construction Area	No	N/A	One partially full, 55 gallon drum of paint waste. HW managed	none
N/A	N/A	N/A	SAA/ Barge Terminal	No	N/A	One partially full, 55 gallon drum of contaminated debris	none
N/A	N/A	N/A	SAA/Rail Rack	No	N/A	One partially full, 55 gallon drum of contaminated debris	none
N/A	N/A	N/A	SAA/Catalyst Facility, 1st floor	No	N/A	One partially full, 55 gallon drum of used T-Vex Suits (P-120)	none
N/A	N/A	N/A	SAA/Catalyst Facility, 1st floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 2nd floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 2nd floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none

N/A	N/A	N/A	SAA/Catalyst Facility, 2nd floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 3rd floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 4th floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 5th floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 5th floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none
N/A	N/A	N/A	SAA/Catalyst Facility, 6th floor	No	N/A	One partially full, 55 gallon drum of P-120 waste	none

[a] NOR Fac. No.:If registration not required - **N/A** (i.e., Satellite Accumulation Areas)
If registration required but not provided - **X** (& note violation of 30 TAC §335.6(c))

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SWR No. 32164
EPA ID No. TXD000751172

Attachment E
Exit Interview Form

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Requested

Regulated Entity/Site Name:	BP Chemical Inc.	TCEQ Add. ID No. RN No. (optional):	32164
Investigation Type:	CEI / Contact Made In-House (Y/N): Y	Purpose of Investigation:	CEI
Regulated Entity Contact:	Mr Van Bose	Telephone No.:	361 552 8642 / Date Contacted: 2-16,17-05
Title:	Env Manager	Fax No.:	361 552 8229 / Date Faxed: 3-9-05

NOTICE: The information provided in this Note is intended to provide clarity to issues that have arisen to the date of this Note during the investigation process between the agency and the company and does not represent agency findings related to violations. Any potential or alleged violations discovered after the date of this Note will be communicated by telephone to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in this investigation's final report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation Issues, include the rule in question with the clearly described potential problem. Other type of issues, fully describe.
No.	Type	Rule Citation (if known)	Description of Issue
1	O		Area of Concern for Old Land Fill (NOR 004) has an exceedance of Cyanide 0.03 ppm over permitted levels.

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Document Acknowledgment. Signature on this document establishes only that the regulated entity (company) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, document will be faxed to regulated entity; therefore, signature not required.

Matt Norren [signature]	3-9-05	X Van A. Bose [signature]	3-9-05
Investigator Name (Signed &Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

COPIES: Original: for Regulated Entity Representative, Copy: TCEQ
Revised 07/29/04

(Note: use additional pages as necessary) Page 1 of 1

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SWR No. 32164
EPA ID No. TXD000751172

Attachment F
RCRA Groundwater Monitoring Checklist

TCEQ INDUSTRIAL AND HAZARDOUS WASTE INVESTIGATION REPORT
COMPLIANCE EVALUATION INVESTIGATION (CEI)
GROUND-WATER MONITORING CHECKLIST

Use this checklist for facilities which have Permitted and Interim Status units which require ground-water monitoring.

Section A -- INTRODUCTION

1. Facility Name: BP Chemical Inc.

2. RCRA Ground-Water Monitoring Status: Complete the table on the next page for each RCRA Waste Management Unit (WMU).

3. Provide a site map locating each monitoring well and associated WMU **(Attachment B)**

Section B -- MONITOR WELL SYSTEM REVIEW

1. Changes to the RCRA Monitor Well System since last CME or CEI:
   a. Have any monitor wells been installed or replaced? N/A____NO_X_YES____
      (i.) If YES, has a copy of the well installation diagram including lithologic logs for each new well been submitted to the TCEQ? N/A_X_YES____NO____
      If not, copies of these are included as **Attachment**____.
   b. Have any monitor wells been designated as inactive since the last CME/O&M (still in place but not being used)? N/A____NO_X_YES____
      (i.) If YES, list.
   c. Have any monitor wells been removed/plugged? N/A____NO_X_YES___
      (i.) If YES, has the plugging report been submitted to the TCEQ? N/A_X_YES___NO____
      (ii.) If YES, list.

2. Has the following been installed in the uppermost aquifer around each Waste Management Area: [335.163 / 264.97; 335.116(a) / 265.91]
   a. At least one hydraulically upgradient well? YES X NO___
   b. At least three hydraulically downgradient wells? YES_X_NO___

3. Indicate WMA(s) that are not compliant with Question #2: N/A

4. Examine operator's records to make the following determinations:
   a. For units in interim status detection monitoring or permitted status detection or compliance monitoring, does the operator evaluate the Ground-Water flow direction in the uppermost aquifer on at least an annual basis to verify well placement? [335.164(5) & .165(5) / 264.98(e) & .99(e); 335.112(a)(5) / 265.93(f)] Yes, twice/year N/A____YES X NO____
   b. For units in interim status assessment monitoring, does the operator determine, on a quarterly basis, the Groundwater flow direction in the uppermost aquifer for use in determining the rate and direction of migration of hazardous constituents? [335.112(a)(5) / 265.93(d)(7)] N/A_X_YES___NO____
   c. Describe operator's actions to address apparent well location errors in response to

40 CFR 265.93(f), 40 CFR 264.98(h), or 40 CFR 264.99(j) or permit or compliance plan provisions as applicable. N/A X

TCEQ Region 14 TCEQ Reg. No. 32164 Investigation Dates 02/16-17/05

***

RCRA GROUNDWATER MONITORING STATUS TABLE

Permit Fac. #	Fac. NOR Unit #	Name of Unit/WMA	Activity Status	Monitoring Status	Number of Upgradient Wells	Number of Downgradient Wells	Monitoring Frequency		
							Starting Date	Sampling Interval	Date of most Recent Sampling Event
50143	004	Old Landfill	Inactive	Active	1	6	1983	twice/year	09/21/04
50143	027	New Landfill	Active	Active	3	6 + 1 extra	1986	twice/year	12/07/04

Permit Fac. # = Unit No. as designated in the Permit (N/A if not applicable) **Fac. NOR #** = Unit number as designated in the Notice of Registration (NOR)

Activity Status: A = Active, CL = Certified Closed, I = Inactive

Monitoring Status: ID = 265 Detection Monitoring, IQ = 265 Assessment Monitoring, IA 265 Alternate or Partial waiver, PDM = 264 Detection Monitoring, PCM = 264 Compliance Monitoring, PCA = 264 Corrective Action Monitoring.

Upgradient/Downgradient wells: Indicate the number of wells and also list the wells for each unit or Waste Management Area (WMA)/Corrective Action Management Area (CAMU), POC =Point of Compliance wells for permitted units.

Sampling Interval: Quarterly (QTR), Semi-Annual (SA), Annual (A), Monthly (M), etc.

(P) GWM Checklist * An entry in this column indicates corrective action or comment is needed.**

TCEQ Region 14 TCEQ Reg. No. 32164 Investigation Dates 02/16-17/05 ***

Section C-- SAMPLING PROCEDURES

Guidance Documents: SW-846; RCRA Ground-water Draft Technical Guidance.

1. Sampling & Analysis Plan (SAP)[335 112(a)(5) / 265.92(a); 335.163(4) / 264.97(d) / or as per permit]:
   a. Is a SAP maintained at the facility? N/A____YES X NO____
      Specify date of SAP evaluated during this INVESTIGATION: 07/18/01
   b. Does the SAP address the following items:
      (i.) Sample collection procedures? N/A____YES X NO____
      (ii.) Sample preservation & shipment? N/A____YES X NO____
      (iii.) Analytical procedures? N/A____YES X NO____
      (iv.) Chain of Custody procedures? N/A____YES X NO____
   c. Is the Company following the requirements of the SAP? N/A____YES X NO____

Section D-- INTERIM STATUS DETECTION MONITORING N/A X

Section E-- INTERIM STATUS ASSESSMENT MONITORING N/A X

Section F-- PERMITTED STATUS DETECTION MONITORING N/A____

Waste Management Area(s) Old Land Fill (NOR 004) and New Landfill (NOR 027)

1. Has the facility submitted ground-water monitoring data to the TCEQ as specified in the permit? [335.163(10)] N/A____YES X NO____

2. Are ground water surface elevations determined at each well for each sampling event? [335.163(6) / 264.97(f)] N/A____YES X NO____

3. Is the facility monitoring for indicator parameters, waste constituents, or reaction products as specified in the permit for each monitoring well? [335.164(1) / 264.98(a)] N/A____YES X NO____

4. Are four replicate samples collected from each background and compliance well at least semi-annually? [335.164(4) / 264.98(d)] N/A____YES X NO____

5. Is the facility following the statistical method designated in the permit for determining whether statistically significant contamination exists? [335.164(6) / 264.98(f)(1)] N/A____YES X NO____

6. If statistically significant evidence for contamination exists at any compliance point, did the facility: [335.164(7)(A),(B),&(C) / 264.98(g)(1),(2),&(3)]
   a. Notify the TCEQ Executive Director in writing within 7 days? N/A____YES X NO____
   b. Immediately sample all monitor wells for the presence, and if so, the concentrations of Part 264, Appendix IX constituents? N/A____YES X NO____
   c. Resample within one month and repeat analysis, if any Appendix IX constituents were found? N/A____YES X NO____

7. If presence of Appendix IX constituents was confirmed, did the facility submit an application for a permit modification to establish a compliance monitoring program within 90 days? [335.164(7)(D) / 264.98(g)(4)].
   No confirmation with MW-TW-7. BP is currently working with Permits in Austin. N/A X YES____NO____

(P) GWM Checklist * An entry in this column indicates corrective action or comment is needed.**

Section G-- PERMITTED STATUS COMPLIANCE MONITORING N/A X

Section I-- COMPLIANCE PLAN REVIEW N/A X

Review Compliance Plan (if applicable) and provide comments.

BAKER BOTTS LLP

1500 SAN JACINTO CENTER
98 SAN JACINTO BLVD.
AUSTIN, TEXAS
78701-4287
512.322.2500
FAX 512.322.2501

AUSTIN
BAKU
DALLAS
HOUSTON
LONDON
MOSCOW
NEW YORK
RIYADH
WASHINGTON

April 4, 2005

BY HAND DELIVERY

Mr. Glenn Shankle
Executive Director
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin, Texas 78753

Aileen M. Hooks
512.322.2616
FAX 512.322.8314
aileen.hooks@bakerbotts.com

Attn: Mr. Mark Stoebner, Financial Administration Division, MC-184

Re: O&D USA LLC; Chocolate Bayou Works, Permit No. HW-50121; Green Lake Plant, Permit No. HW-50143 and UIC Well Permit Nos. WDW-163, WDW-164, and WDW-165/Financial Assurance Demonstration

Dear Mr. Stoebner:

This transmittal is to supplement our submission last Thursday, March 31, 2005, of documents demonstrating financial assurance for O&D USA LLC for the above-referenced hazardous waste permits for the Green Lake Plant and Chocolate Bayou Works and for the above-referenced permits for the UIC wells located at the Green Lake Plant. With last Thursday's submission we provided a copy of the standby trust agreement between JP Morgan Trust Company and O&D USA LLC for use with the surety bond for closure/post-closure care. Enclosed with today's transmittal is the original of that trust agreement. Together with the original surety bonds for closure/post-closure care and for liability that were submitted last Thursday, this completes the required financial assurance demonstration for O&D USA LLC for these facilities in connection with the transfer of the permits from BP Amoco Chemical Company to O&D USA LLC.

Please call me if you have questions about the financial assurance demonstration for these facilities. Thank you again for your assistance.

Sincerely,

Aileen M. Hooks

Enclosure

cc: E. J. Biskup
Ben Knape
Wade Wheatley
Roberta Lewis
Rosemary Martinez
Juan Soto
Dana Wood

AUS01:376743.2

DUE DATE _____
WWC# 10931478-1
PM C. Palomarea
TEAM ☐ 1 ☑ 2 ☐ UIC

IHW 32164 CO

June 27, 2005

CERTIFIED MAIL NO. 70041160000705581036
RETURN RECEIPT REQUESTED

Ms. Janet Cornelissens
Texas Commission on Environmental Quality
Registration, Review, and Reporting Division
Registration and Reporting Section, MC 129
IHW and MSW Registration Team
P.O. Box 13087
Austin, Texas 78711-3087

Subject: **Change of Name Notification**
Solid Waste Registration No. 32164
EPA RCRA ID TXD000751172
Innovene USA LLC, Green Lake Plant, CN602817884, RN100210038

Dear Ms. Janet Cornelissens:

Innovene USA LLC would like to notify the Texas Commission on Environmental Quality (TCEQ) that the name of the owner of the Green Lake Plant with Solid Waste Registration No. 32164 and EPA RCRA ID TXD000751172 changed from O&D USA LLC to Innovene USA LLC on June 1, 2005. Only the name of the company has changed from O&D USA LLC to Innovene USA LLC. The ownership and key operational factors including personnel responsible for the day-to-day activities will remain the same. Attached is a copy of the TCEQ Core Data form with Innovene USA LLC's information.

Thank you for your time and consideration in this matter. If you have any questions or comments, please call me at (361) 552-8642 or email me at booneva@bp.com.

Sincerely,

Van A. Boone
HSSEQ Manager
Green Lake Plant

Attachments: TCEQ Core Data Form (TCEQ-10400)

ADM (4)

5330
PD
UH
7/5/05

INCU

COPY

innovene

October 25, 2005

Ms. Kimberly Sladek
Texas Commission on Environmental Quality
Attention: Permits Administrative Review Section, MC 161
Registration, Review & Reporting (RR&R) Division
P. O. Box 13087
Austin, Texas 78711-3087

Part B Permit Modification and
Compliance Plan Application
TCEQ Hazardous Waste Permit No. HW-50147
Innovene – Green Lake Plant
Port Lavaca, Texas

Dear Ms. Sladek:

In response to your telephone request for additional information regarding the referenced Compliance Plan Application, Innovene is submitting the attached revised Compliance Plan Application pages 2, 3 and 5 (signature page).

If you have any questions or require additional information, please contact Van A. Boone at (361) 552-8642. We appreciate your consideration of this matter.

Sincerely,

John Harvey III
General Manager

Attachment: Original and 2 copies, TCEQ Compliance Plan Application pages 2, 3, and 5.

Agent in Service or Agent of Service who is a Texas resident.

C.T. Corporation System
1601 Elm Street, Suite 3700
Dallas, Texas 75201

List the name of the individual who will be responsible for causing notice to be mailed and/or published in the newspaper and his/her mailing address, telephone number and fax number in the space provided below. If e-mail is available, please provide an e-mail address.

Van A. Boone , HSE Department, Innovene USA LLC (formerly BP Amoco Chemicals) Green Lake Plant
P.O. Box 659 Port Lavaca, TX 77979
(Name and mailing address)

(361) 552-8642 -telephone (361) 552-8229 -fax van.boone@innovene.com -email
(Telephone number, fax number and e-mail address)

4. Facility Information

Facility Name: Innovene USA LLC (formerly BP Amoco chemicals) Green Lake Plant

Physical address: The site is located on a 2,300-acre tract of land in Calhoun County adjacent to Highway 185, approximately four miles north of the intersection of Hwy. 185 and Hwy. 35 and approximately 15 miles west of Port Lavaca, TX.

City: Port Lavaca County: Calhoun

Provide a brief written description of the portion of the facility covered by this application: The groundwater monitoring system at the closed old hazardous waste landfill - NOR unit No. 004.

Identify the city and a major highway intersection closest to the facility: The site is located on a 2,300-acre tract of land in Calhoun County adjacent to Highway 185, approximately four miles north of the intersection of Hwy. 185 and Hwy. 35 and approximately 15 miles west of Port Lavaca, TX.

Provide a brief description of the type of business (e.g., chemical, manufacturing, petroleum) and the product(s) manufactured or produced by the facility. Innovene USA LLC uses BPs proprietary, fluid-bed propylene ammoxidation process and high efficiency catalyst to produce acrylonitrile, acetonitrile, and acetone cyanohydrin.

The total acreage of the facility being permitted: 2,300 acres

Geographical Latitude: North 28°32'32" Geographical Longitude: West 96°50'05"

Identify the name of the drainage basin and segment where the facility is located: Drainage area of Segment 1701 of the Lavaca- Guadalupe Basin

List Industrial Solid Waste (ISW) Registration Number(s) for the facility: 32164
EPA I.D.No.: TXD 000751172

Industrial and Hazardous Waste Permit No. (if not a new application): HW-50143-000

Municipal Solid Waste Permit No. (if applicable): N/A
Air Permit No(s). (if applicable): PSDTX76M7(active), CB0034B(active acct. number), 1284 (pending permit), New Air Source Permits: 6289, 8533, 18046, 19985, 56687
Wastewater Permit No(s). (if applicable): WQ-02181

5. Is the facility located within the Coastal Management Program boundary? _____ Yes. ✔ No.
(Page i of the application instructions lists telephone numbers for inquiries or questions.)

6. Application Type (Check the Appropriate Type)

✔ New Compliance Plan
_____ Compliance Plan Renewal
_____ Amendment (Check the Appropriate Amendment):
___Major ___Minor
_____ Modification (Check the Appropriate Modification):
___Class 3 ___Class 2 ___Class 1[1] ___Class 1

7. When applying for a modification or amendment to a Compliance Plan, indicate in the table the following: the Section of the Compliance Plan being modified or amended; a brief description of the proposed change; the type of modification (e.g., Class 1, 2 or 3) or amendment (Minor or Major Amendment); and the regulatory citation which supports the modification or amendment. The applicant should describe the exact change(s) to be made to the Compliance Plan conditions. Any proposed language may be submitted as an attachment to Part I of this application. **N/A**

Compliance Plan Section	Brief Description of Proposed Change	Modification or Amendment Type	Supporting Regulatory Citation
N/A	N/A	N/A	N/A

8. Adjacent Landowners List

Submit a map indicating the boundaries of all adjacent parcels of land, and a list (see samples in the instructions) of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch, or drawing with a scale adequate enough to show the cross-referenced affected landowners. The list should be updated prior to any required public notice.

See Attached Figure I.8

Except for Class 1 or Class 1[1] modifications, please also submit this mailing list on a 3½-inch computer disc using software compatible with WordPerfect, as allowed by 30 TAC 39.5(b). If more convenient, four sets of printed labels of the list may be provided in lieu of a computer disc.

If the adjacent landowners list is submitted on computer disc, please label the disk with the applicant's name and permit number. Within the file stored on the disk, type the permit number and applicant's name on the top line before typing the addresses. Names and addresses must be typed in the format indicated below. This format is required by the U.S. Postal Service for machine readability. **Each letter in the name and address must be capitalized, contain no punctuation, and the appropriate two-character abbreviation must be used for the state. Each entity listed must be blocked and spaced consecutively as shown below.**

Example 1:

Permit No. HW-50000, Chemical Plant

TERRY M JENKINS
RR 1 BOX 34
WACO TX 76724

Example 2:

Permit No. HW-50000, Chemical Plant

MR AND MRS EDWARD PEABODY
1405 MONTAGUE LN
WACO TX 76710-1234

APPLICATION SIGNATURE PAGE

CERTIFICATION

I, John Harvey, III, Works General Manger; and,
(Print or Type the Name of the Applicant's representative) (Title)

I, _____, _____
(Print or Type the Name of the Owner's representative, if different) (Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: John Harvey III Date: 10-25-05
(Applicant)

Signature: _____ Date: _____
(Owner, if different than applicant)

//

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT:

I, _____, hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign my application, submit additional information as may be requested by the Commission, and/or appear for me at any hearing or before the Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit or compliance plan. I further understand that I am responsible for oral statements given by my agent in support of the application, for compliance with the terms and conditions of any plan which might be issued based on this application.

_____
(Type or Print Name)

_____
(Signature)

//

NOTE: APPLICATION MUST BEAR SIGNATURE AND SEAL OF NOTARY PUBLIC

SUBSCRIBED AND SWORN to before me by the said Rose Padron

on this 25th day of (month) October, (year) 2005

My commission expires on the 28th day of (month) Feb, (year) 2009

(Seal)

ROSE PADRON
Notary Public, State of Texas
My Commission Expires
FEB. 28, 2009

_____
Notary Public in and for
Calhoun County, Texas

IHW/32164/CO

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 9, 2006

Mr. Van A. Boone
HSSEQ Manager
Innovene USA LLC.
Green Lake Complex
P.O. Box 659
Port Lavaca, TX 77979

7004 1350 0000 4763 5443
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Technical Notice of Deficiency
Class 3 Permit Modification and Compliance Plan Application
Innovene USA LLC., Green Lake Complex
Calhoun County, Texas
Industrial Solid Waste Registration No. 32164
Hazardous Waste Permit No. 50143
Proposed Compliance Plan No. 50143
EPA I.D. No. TXD000751172
WWC 11121755-2 and 11121315; RN 100210038 / CN 600126775

Dear Boone:

We have completed a technical review of your Class 3 Permit Modification and Compliance Plan Application dated September 30, 2006. Our review of the application indicates that additional information must be presented to demonstrate compliance with Title 30 Texas Administrative Code (TAC) Sections 305.45 and 305.50. In addition to other requirements, the above rules adopt by reference the requirements listed in Title 40 of the Code of Federal Regulations (CFR) Parts 264 and 270. The deficiencies noted below follow the format of Texas Commission on Environmental Quality (TCEQ) Part A Compliance Plan application forms.

1. Please provide the TCEQ with a legible 8.5 by 11" map which locate any and all hazardous waste management units (HWMUs) and on a separate 8.5 by 11" map locate any and all active or inactive solid waste management units (SWMUs). Also please list all the HWMUs and SWMUs in a table format for review.

2. Innovene should provide the TCEQ a RCRA Facility Assessment (RFA) which should have been completed for all SWMUs at the Innovene facility or its predecessor. Please list all the SWMUs the RFA were conducted in table format, along with the conclusions and recommendations for each SWMU. Innovene should conduct a survey/research to identify all their SWMUs if Innovene or its predecessor has not done so in the past. Innovene should also identify which SWMU has a high potential for a release and include this information with the list of all SWMUs.

3. Innovene provided the TCEQ financial assurance calculations for one monitoring well at their HWMU for 8 years. Financial assurance should be calculated based upon hiring a third party to conduct post-closure care and/or corrective action at unit(s) to protect human health and the environment. Post-closure care may include a corrective action program for a time period of 30 years. Financial assurance cost should also include any and all SWMUs that would need an RCRA Facility Investigation (RFI) and be included in Innovene's Compliance plan.

4. Innovene states that it will conduct further site assessment of the Old Hazardous Waste Landfill (OHWL) and propose a corrective action program if necessary. Innovene should conduct a site assessment/characterization right now at the OHWL to determine the extent of the potential plume and to better understand the subsurface geologic and hydrogeologic conditions. This information should be used to propose a corrective action program to be implemented in their final Compliance Plan.

The information requested above is necessary for a complete permit application. Please submit an original and three (3) copies of your application revisions, including signature pages within 30 days of the date of this letter. Please note, we do not anticipate granting an extension of time to fulfill this request. Your response should be in a form that allows for the replacement of application pages with the revised pages. Each page should contain a revision date and revision number as well.

Failure to submit a satisfactory response to each of the noted deficiencies by the response due date will result in a recommendation to return the application or deny the compliance plan and may result in a referral to the Enforcement Division. Please be aware that the current practice of this section is to not issue a third technical notice of deficiency.

If you have any questions regarding this matter, please contact Ms. Cynthia Palomares at 512/239-6079. If you will be responding by letter, please include mail code MC 130 in the mailing address.

Sincerely,

Cynthia Palomares

Cynthia Palomares, P.G., Project Manager
Industrial and Hazardous Waste Permits Section
Waste Permits Division
Texas Commission on Environmental Quality

CP/fp